

**CABINET: DYDD MERCHER, 28 MEDI 2022 at 3.30 PM**

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Cynhelir cyfarfod y Cabinet yn Ystafell Bwyllgor 4 ac fel cyfarfod aml-leoliad ar **Dydd Mercher, 28 Medi 2022 At 3.30 Pm**

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**A G E N D A**

**Arweinydd**

- 1 Ymddiriedolaeth Parc Maendy - Trefniadau Penderfynu (*Tudalennau 3 - 28*)

**Newid yn yr Hinsawdd**

- 2 Rhaglen Rheoli Risg Arfordirol - Caffael contract adeiladu diwygiedig i gyflawni'r gwelliannau i amddiffynfeydd arfordirol (*Tudalennau 29 - 140*)
- 3 Strategaeth Ailgyrchu Caerdydd a'r Rhaglen ar gyfer Newid (*Tudalennau 141 - 466*)

**Diwylliant, Parciau a Digwyddiadau**

- 4 Ymateb Adroddiad Craffu ar yr Economi a Ddiwylliant ar Chwaraeon Cymunedol yng Nghaerdydd: Partneriaethau Chwaraeon Rhanbarthol (*Tudalennau 467 - 518*)

**Addysg**

- 5 Cynllunio Trefniadaeth Ysgolion: Darpariaeth ar gyfer plant a phobl ifanc sydd ag anghenion dysgu ychwanegol - anghenion dysgu cymhleth a darpariaeth cyflwr sbectrwm awtistig ar gyfer disgyblion oedran cynradd ac uwchradd (*Tudalennau 519 - 706*)

**Cyllid, Moderneiddio a Pherfformiad**

- 6 Adroddiad Cwynion Blynyddol Cyngor Caerdydd 2021-22 (*Tudalennau 707 - 736*)
- 7 Monitro Cyllideb - Mis 4 2022/23 (*Tudalennau 737 - 786*)
- 8 Rheoli Risg Corfforaethol - Chwarter 4 (*Tudalennau 787 - 818*)

**Buddsoddi a Datblygu**

9 Cynllun Eiddo Blynyddol (*Tudalennau 819 - 850*)

### **Gwasanaethau Cymdeithasol**

10 Adroddiad Blynyddol y Pwyllgor Cynghori Rhianta Corfforaethol 2021-2022  
(*Tudalennau 851 - 888*)

### **Mynd i'r Afael ag Iechyd y Cyhoedd ac Anghydraddoldeb**

11 Cynllun Gweithredu HIV ar gyfer Cymru: Cael gwared ar HIV - Gwella Ansawdd  
Bywyd a Mynd i'r Afael â'r Stigma sy'n gysylltiedig â'r Feirws - Ymateb i  
Ymgynghoriad (*Tudalennau 889 - 924*)

### **Trafnidiaeth a Chynllunio Strategol**

12 Ystyried cais am Godi Prisiau Cerbydau Hacni (ystyried sylwadau sydd wedi  
dod i law) (*Tudalennau 925 - 952*)

### **PAUL ORDERS**

Chief Executive

**This document is available in Welsh / Mae'r ddogfen hon ar gael yn Gymraeg**

**MAINDY PARK TRUST – DECISION MAKING ARRANGEMENTS****LEADER (COUNCILLOR HUW THOMAS)****AGENDA ITEM: 1**

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**APPENDIX A TO THIS REPORT IS EXEMPT FROM PUBLICATION PURSUANT TO THE LOCAL GOVERNMENT ACT 1972, SCHEDULE 12A, PART 4, PARAGRAPH 16**

**Reason for this Report**

1. For the Cabinet to agree the decision making arrangements to discharge its role as sole trustee of the charitable trust, Maindy Park, in relation to a land exchange proposed by the Council in its statutory local authority capacity.

**Background**

2. The Council is the sole corporate trustee of Maindy Park, a charity registered with the Charity Commission under Charity Number 524137 (“the Charity”).
3. The land was gifted by the Marquis of Bute to the Mayor, Aldermen, and Burgesses of the City of Cardiff by an Indenture dated 15th August 1922, subject to covenants to use the land for open space, recreation and Playground (Appendix 1).
4. The current site mainly features an outdoor velodrome, which was constructed for the Empire Games held in Cardiff in 1958, and also a leisure centre with car park. These facilities have been let to a leisure operator under a public concession contract and subject to a long lease.
5. The Council, in its separate capacity as Local Education Authority, proposes to expand Cathays High School, situated opposite the Charity land. The Cathays High School proposals were approved by Cabinet in October 2021, subject to the resolution of certain property and trust matters relating to Maindy Park, being part of the land required for the expansion of the school.
6. The Council is also undertaking a separate project to relocate the existing Velodrome to the International Sports Village, which the Council is developing as a centre of high quality sports facilities. The Council has consulted on that relocation and the outcomes of the

consultation were reported to Cabinet in March 2022, when it was agreed that the new Velodrome should be progressed as part of the combined cycling facilities. The Velodrome relocation proposals will be further considered by the Cabinet, along with the full business case for the proposed combined cycling facilities, for decision in February 2023.

7. The Council is faced with conflicting interests between its proposed development projects and acting in the best interests of the Maindy Park Trust.

## **Issues**

8. The proposed use of part of Maindy Park for the school expansion is not compatible with the objects of the Maindy Park Trust. However, the Council, in its capacity as local authority, may offer suitable substitute land to the Trust for its charitable purposes in exchange for land required at Maindy Park.
9. Under charity law, the consent of the Charity Commission would be required for the proposed exchange of land, because this would be regarded as a disposal to a 'connected person' within Part 7 of the Charities Act 2011.
10. The Council has accordingly, identified two substitute parcels of land located at Blackweir and Cae Delyn Park that could be offered in exchange for land at Maindy Park and obtained independent valuation advice in relation to the proposed land exchange. The Council has also undertaken a consultation exercise in relation to the proposed land exchange as a means to ensure wider consultation across the city. All duly submitted consultation responses are to be considered in the decision making process.
11. The status of Maindy Park as a charitable trust requires the Council, separately, as Trustee, to consider the proposed land exchange, and make a separate Trust decision having regard to the objects and best interests of the Charity ('the Trust Decision').
12. In view of the Council's conflict of interests in this matter, advice has been sought from Counsel in relation to how the Council should manage its conflict of interests and ensure its decision making process is lawful and robust.

## **Proposed Decision Making Arrangements**

13. In line with Counsel's advice, Cabinet is recommended to agree the following decision making arrangements to manage the Council's conflicts of interests in this matter and ensure the Trust Decision is taken properly in the best interests of the Trust:

(i) Individual members of the Cabinet should identify and declare any potential conflicts of interest in the Trust Decision and any Member who voted on the Council's development proposals or is directly involved / interested in those proposals should declare a 'serious conflict of interests' in the Trust Decision and refrain from taking any part in the Trust Decision. It is understood that there are 4 remaining Cabinet members, 2 of whom are Cabinet job-sharers (of different Cabinet portfolios), who have no 'serious conflict of interests'.

(ii) To set up an Advisory Committee (under section 102(4) of the Local Government Act 1972), 'the Maindy Park Trust Advisory Committee', comprised of 3 independent members of the Standards and Ethics Committee and or the Governance and Audit Committee, with the following terms of reference:

'(a) To consider whether the land exchange proposed by Cardiff Council in its statutory capacity as local authority should be agreed by the Maindy Park Trust ('the Charity'), having regard to the best interests of the Charity and its beneficiaries, and all relevant evidence in this respect, including (but without limitation to) independent valuation advice on the relevant land and views submitted in response to the public consultation on this matter; and

(b) to make a recommendation to Cabinet, in its capacity as Trustee of the Charity, on whether or not the proposed land exchange should be agreed (subject to approval by the Charity Commission).'

(iii) For Cabinet to take the Trust Decision on the proposed land exchange, having regard to the recommendations of the Maindy Park Trust Advisory Committee (please see sub-paragraph (ii) above), PROVIDED THAT no seriously conflicted Cabinet Member, that is, any Member who has had any previous involvement, or has any other personal interest, in the Council's development proposals concerning Maindy Park, shall take any part in the Trust Decision (any seriously conflicted Cabinet member shall declare their conflict of interests and withdraw from the Cabinet meeting).

14. In relation to Cabinet Job-Sharers, Counsel has advised that where one job sharer has declared a serious conflict of interest ('JS-C'), their job sharing partner who has no serious conflict of interests ('JS-P') may participate in the Trust Decision and vote, provided that JS-C has agreed to give JS-P unfettered discretion in relation to the decision and shall not seek to influence their vote in any way.
15. As noted in paragraph 9 above, if the Trust Decision is to approve the proposed land exchange, this will be subject to approval by the Charity Commission under Part 7 of the Charities Act 2011, which will provide further independent assurance that the decision has been taken lawfully and properly.

## **Reason for Recommendations**

16. To allow the Council to properly discharge its responsibilities as Trustee of Maindy Park Trust and manage its conflict of interests in relation to the development projects it is progressing in its statutory capacity as local authority.

## **Scrutiny Consideration**

17. The Policy Review and Performance Scrutiny Committee will consider this issue on 26 September. Any comments received will be circulated at the Cabinet meeting.

## **Financial Implications**

18. The remuneration provided to Independent members agreeing to sit on the proposed new Advisory Committee will be funded from an earmarked Reserve. The amount of remuneration paid to the Independent members will be in accordance with the approved Schedule for Members Remuneration.

## **Legal Implications**

19. The Council's functions, as sole corporate trustee of Maindy Park ('the Charity'), are executive functions (pursuant to section 13 of the Local Government Act 2000 and the Functions and Responsibilities Regulations issued thereunder, SI 2007/399). Under the Council's Scheme of Delegations, Section 2, paragraph 43, these functions are reserved to the Cabinet.
20. As trustee, the overriding duty of the Council is to further the purposes of the Charity. Any decisions taken by the Cabinet in exercise of the Council's role as trustee must be taken in the best interests of the Charity.
21. As noted in the body of the report, the Council has a conflict of interests between its proposed development projects affecting Maindy Park and its duties, as trustee of the Charity, to act in the best interests of the Charity; and independent legal advice has therefore been sought from Counsel on the decision making arrangements the Council should make in order to properly manage its conflict of interests. Counsel's advice is attached as **Appendix A** (Exempt from publication).
22. In line with Counsel's advice, the report recommends the appointment of an independent Advisory Committee, the Maindy Park Trust Advisory Committee, with the membership and terms of reference set out in paragraph 13(ii) of the report.
23. An advisory committee may be appointed (under section 102(4) of the Local Government Act 1972) to advise the Cabinet in relation to the discharge of executive functions. An advisory committee may consist of such persons (whether members of the Council or not), appointed for

such term as may be determined by the Council (but may not include Council employees or anyone who is disqualified from being an elected Member of the Authority, for example, those declared bankrupt).

24. The appointment of an advisory committee, its membership and terms of reference, may be recommended by the Cabinet, but requires the approval of full Council (pursuant to Regulation 3(9) of the Local Authorities (Executive Arrangements) (Functions and Responsibilities) Wales Regulations 2007).
25. Meetings of an advisory committee are governed by the Committee Meeting Procedure Rules; and the Access to Information Procedure Rules apply in relation to public access to meetings, agendas and reports (Local Government Act 1972, section 100E(3)(a)).
26. An advisory committee may only advise the Cabinet in relation to the Trust Decision on the proposed land exchange. The Trust Decision remains the responsibility of the Cabinet, to be taken having regard to the recommendations of the advisory committee.
27. Under the Cabinet Procedure Rules, the quorum for a meeting of the Cabinet is three. As noted in paragraphs 13 and 14 of the report, after all Cabinet members with a serious conflict of interests in the Trust Decision have withdrawn, the number of remaining Cabinet members will meet the quorum requirements to enable the Trust Decision to be lawfully made.
28. It should be noted that this report recommends a decision making process only, and is separate to the substantive Trust Decision. Any Member who declares a serious conflict of interests in relation to the Trust Decision is not necessarily precluded from participating in the consideration of the decision making process which is the subject of this report. Members should consider, in the usual way, whether they have any personal interest under the Members' Code of Conduct in the recommendations of this report, and if so, whether that interest is prejudicial, having regard to advice from the Monitoring Officer. The Monitoring Officer's general advice is that, under the Members' Code of Conduct, a Member's involvement in previous Cabinet decisions relating to the development proposals affecting Maindy Park would not constitute a personal interest in the recommendations of this report.
29. Other relevant legal implications are set out in the body of the report.

### **Property Implications**

30. There are no property implications arising from this report.

### **HR Implications**

31. There are no HR Implications arising from this report.

## RECOMMENDATIONS

Cabinet is recommended to:

1. Note any serious conflicts of interest declared by individual Cabinet members in relation to the Maindy Park Trust Decision in respect of the Council's proposed land exchange;
2. Recommend to Council the appointment of the 'Maindy Park Trust Advisory Committee', comprised of 3 independent members of the Standards and Ethics Committee and /or the Governance and Audit Committee, with the following terms of reference:  

'(a) To consider whether the land exchange proposed by Cardiff Council in its statutory capacity as local authority should be agreed by the Maindy Park Trust ('the Charity'), having regard to the best interests of the Charity and its beneficiaries, and all relevant evidence in this respect, including (but without limitation to) independent valuation advice on the relevant land and views submitted in response to the public consultation on the proposal; and

(b) to make a recommendation to Cabinet, in its capacity as Trustee of the Charity, on whether or not the proposed land exchange should be agreed (subject to approval by the Charity Commission).'
3. Receive a further report on this matter in due course setting out the recommendations of the Maindy Park Trust Advisory Committee in respect of the Council's decision, as trustee of the Maindy Park Trust, on whether to agree to the proposed land exchange ('the Trust Decision'), PROVIDED THAT any Member with a serious conflict of interests in this matter shall declare that interest and withdraw from consideration of the Trust Decision.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Director Name</b> Davina Fiore, Director of Governance and Legal Services
	Date submitted to Cabinet office

*The following appendices are attached:*

*APPENDIX A – Counsel's advice in the matter of Maindy Park Trust dated 3rd February 2022 and 12th September 2022 (Exempt from publication under the Local Government Act 1972, Schedule 12A, Part 4, paragraph 16)*

### Background papers

*Cabinet report, '21<sup>st</sup> Century Schools: The Expansion and Redevelopment of Cathays High School', 14<sup>th</sup> October 2021; and decision in respect thereof.*



*Cabinet report, 'Cardiff Bay Regeneration Overview', 10<sup>th</sup> March 2022; and decision in respect thereof.*

Mae'r dudalen hon yn wag yn fwriadol

Yn rhinwedd paragraff (au) 16 Rhan (nau) 4 a 5 o Atodlen 12A  
o Ddeddf Llywodraeth Leol 1972.

Mae'r ddogfen yn gyfyngedig

Mae'r dudalen hon yn wag yn fwriadol

**CARDIFF COUNCIL  
CYNGOR CAERDYDD**



**CABINET MEETING: 28 SEPTEMBER 2022**

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**COASTAL RISK MANAGEMENT PROGRAMME – REVISED  
PROCUREMENT OF A CONSTRUCTION CONTRACT TO DELIVER  
THE COASTAL DEFENCE IMPROVEMENTS**

**CLIMATE CHANGE (COUNCILLOR CARO WILD)**

**AGENDA ITEM: 2**

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***Appendix 1, A and B to this report is exempt from publication on the basis that it contains information of the description set out in paragraphs 14 and 21 of Part 4 of schedule 12 A of the Local Government Act 1972 and in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.***

**Reasons for this Report**

1. To seek Cabinet approval on the revised design for the coastal protection scheme and the full business case to be submitted to Welsh Government for the Coastal Risk Management Programme.
2. To provide a briefing to Cabinet on the financial agreement with Welsh Government to fund the delivery of the coastal protection scheme.
3. To seek Cabinet approval for the delegation of the award of contract following Welsh Government approval of the Full Business Case, to deliver the coastal defence improvements.
4. To seek Cabinet approval to commit to the funding contribution within the financial implications in Appendix 1.

**Background**

5. Following assessment reports; *Rover Way Foreshaw Coastal Defence Assessment, Mott McDonald, 2009* and *Cardiff Council Coastal Erosion Risk Assessment, Atkins, 2013*, there was an identified need to improve the condition of coastal defences in the River Rhyrney and Coast around Rover Way.
6. The Coastal Risk Management Programme is in Cardiff Council's Corporate Risk Register.

7. The proposed scheme will reduce flood risk to 2,326 residential and 204 non-residential properties in southeast Cardiff.
8. The scheme has been revised removing the element of river and coastal protection protecting Lamby Way landfill and associated infrastructure.
9. Welsh Government have confirmed the Coastal Risk Management Programme grant will not fund any costs associated with the protection of Lamby Way landfill and associated infrastructure.
10. The scheme will provide defence for a 1 in 200 year severe weather event, plus an allowance for climate change influence of 40%.
11. A procurement exercise took place from October 2021 to January 2022 with one tender submitted.
12. Although the tender was valid, the Contractor was unable to accept award of the contract due to significant inflation following the outbreak of war in Ukraine. The NEC Option C Target Cost contract could not be legally modified to include the X1 clause for inflation.

#### The Outline Business Case

13. Cardiff Council received 100% funding from Welsh Government for the development of the Outline Business Case. Based on the assessments undertaken the preferred option identified was Option 6 to improve the coastal protection measures as follows:
  - Rock revetment along the coast to manage erosion and wave overtopping
  - Sheet piling along Lamby Way Roundabout
  - Maintain earth embankments elsewhere and raise low points in earth embankments where required to reduce flood risk.
  - Rock scour protection added to Lamby Way Bridge.
14. The consultancy services for the Outline Business Case were carried out by Jeremy Benn Associates (JBA) and procured under the Construction Consultancy Framework managed by the National Project Service (NPS), using the relevant 'Water Management' Lot under the framework.
15. Welsh Government accepted the submitted Outline Business Case in March 2018 as part of a funding application, to proceed to the Full Business Case.

#### The Full Business Case (revised)

16. Cardiff Council has received 100% funding from Welsh Government totalling £1.13M for the development of the Full Business Case to deliver the detailed design and cost estimates to construct the coastal defence improvements.
17. The development of the Full Business Case and detailed design was awarded to

JBA following a competitive tender under the NPS Framework.

18. There was a requirement to develop the design and full business case concurrently with all required permissions, consents, and licenses for construction, including planning permission, marine license and flood risk activity permit.
19. With agreement with Cardiff Council. JBA employed a Contractor, Knights Brown, to provide Early Contractor Involvement (ECI) advice through the developed and detailed design stages. This enables the Client team to benefit from the knowledge and experience of a Contractor to advise on buildability of the design, programme and cost estimating whilst maintaining control of the design and statutory processes.
20. The preferred option in the Full Business Case, as indicated in the Cabinet Report dated 17th June 2021, for the coastal defence improvements is as follows:
  - Rock revetment along the coast to manage flood and erosion risk in front of Rover Way to the River Rhymney.
  - Raising earth embankments to reduce flood risk.
  - Installation of Sheet Pile with Dycel blocks and brushwood scour protection on the fronting slope along Lamby Way Roundabout.
  - Increase earth embankment at Parc Tredelerch and construct a flood wall at Windsor Gardens in Year 50.
21. Section 5 of the Outline Business Case preferred option (Windsor Gardens and Parc Tredelerch) have been delayed 50 years as there is no flood or erosion risk under present day conditions. Therefore, there is no criteria to support Welsh Government funding for this work at this time.
22. The cost to deliver Section 5 in 50 years' time has been estimated at £3.15M at the time of delivery. Welsh Government have confirmed they will not fund this element at this time.
23. The revised scheme removes the rock revetment along the coast in front of Lamby Way landfill and the erosion protection on meanders opposite Lamby Way roundabout and Cardiff Sailing Club. This change only removes protection to infrastructure relating to Lamby Way landfill and associated aspects such as highways and solar farm.
24. The risk of flooding of 2,326 residential and 204 non-residential properties in southeast Cardiff will be reduced. However, the current risk relating to the infrastructure of Lamby Way Landfill, highways and solar farm will remain. It is intended following the completion of the improvements to remove the risk from the Corporate Risk Register and manage the ongoing risks at a Directorate level.
25. A flood gate will be installed at the access to Cardiff Sailing Club which will need to be maintained and closed when there is a risk of flooding. This will be managed and maintained as part of the flood assets within the Assets and

Engineering Team with operational aspects managed within Highway Operations.

26. The principle of the design is to minimise concerns relating to existing habitats in the tidal influence within the river and coastal foreshore whilst ensuring the coastal protection improvements have limited ongoing maintenance.
27. The full business case presents the preferred option as economic viable with a Benefit Costs Ratio of 1.6. The benefit cost ratio is an indicator showing the relationship between the relative costs and the benefits of a proposed project, expressed as monetary or qualitative terms. Projects with a value greater than 1.0 deliver a positive net present value to the investment being made.
28. The increase in estimated construction costs from the 2018 Cabinet Report has come from a requirement to design for an increase in climate change influence from 30% to 40% as required by Welsh Government and the site investigation boreholes undertaken during the detailed design process.
29. The cost increase relating the climate change is influenced by the following changes:
  - Coastal defences are now larger in height and profile.
  - River section defences are now raised and previous infills defences now require much longer stretches of defence to be constructed and raised.
30. The cost increase relating to the geotechnical site investigations is influenced by the following changes:
  - The results indicate much larger sheet piles are required.
  - Due to the location of bedrock the length of sheet pile is limited. This means that the slope in front of the sheet pile must be maintained to prevent failure. This led to the addition of scour protection to the bank slope fronting the sheet pile sections to retain the slope. The design will also replace the mud over the scour protection on the upper slope to maintain designated mud habitats.
31. The estimated internal costs to deliver the scheme is included in the £5.6M on costs. This will cover the following aspects:
  - Contract Management
  - Cost Management
  - Supervision of work
  - Ongoing support from JBA as designer
  - £5M allowance for risk relating to contract delivery, including inflation
32. The scheme will provide protection to existing key infrastructure, such as Rover Way, adjacent businesses and associated utilities.
33. The scheme will provide a gravel/stone dust path to form part of the Wales Coastal Path linking with existing public rights of way.
34. Construction of the coastal improvements need to commence before 31<sup>st</sup> March 2023 to meet the requirements of the Welsh Government Coastal Risk



Management Programme (CRMP).

### Submission requirements and timelines

35. The Cardiff Coastal Improvement project is identified within the Welsh Government Coastal Risk Management Programme (CRMP). A funding letter from Welsh Government to enable the delivery of coastal defence improvement will not be issued without the following information being provided:
- Full Business Case with tendered costs for the works.
  - Planning consent.
  - Marine Licence (NRW).
  - Copy of the published Coast Protection Notice and report on representations received.
  - Copy of Coastal Protection Act Approval.
  - Any other statutory consents required to carry out the works.
  - Confirmation Land agreements/Crown Estates agreements are in place to enable construction.
  - General Arrangement Drawings.
  - Tender Appraisal Report.
  - Copy of successful tender.
36. The Council has received the Marine Licence dated 21<sup>st</sup> July 2022 and planning will be reviewing the scheme at the November Planning Committee to support the process of planning consent.
37. The key programme dates are as follows:
- i. Submission of Final Business Case to Welsh Government – October 2022
  - ii. Open tender for delivery of the coastal improvement project – October 2022
  - iii. Award tender for construction contract – January 2023
  - iv. Construction commencement – March 2023
  - v. Construction completion – August 2025

### Procurement Strategy

38. Cardiff Council commissioned Faithful & Gould to provide a procurement options report to review the best approach to procure the scheme.
39. Due to the specialist nature of the construction, the recommendation was not to utilise the frameworks available. Although, this may have provided the quickest procurement route, there was a need for the contractors on the frameworks to engage specialist contractors due to the nature of the work. It was felt this would have adversely influenced the cost of the contract and may have led to similar procurement timescales.
40. The approach will be an open tender. This approach allows any contractor to submit a tender for the construction of the coastal improvement schemes.
41. The contract to be used is a target cost contract (NEC ECC Option C) to share risk and reward in the construction stage. This approach should prove attractive

to the market due to the incentives provided by pain/gain mechanism and shared risk between parties.

42. The risk profile for this project is high and Cardiff Council will likely get better value for money with this approach compared to a fixed sum contract where contractors would likely include a significant risk allowance within the lump sum price.
43. The tender assessment will be based on a 60 price / 30 quality / 10 social value split.

#### Financial Agreement with Welsh Government to deliver the Coastal Protection Scheme

44. The Welsh Government Coastal Risk Management Programme provides a one-off opportunity for local authorities to implement coastal improvements with Welsh Government contributing 85% of construction costs (previously 75%).
45. The purpose of the Welsh Government funding is to assist local authorities in meeting ongoing revenue pressures and free up additional resources to self-finance the coastal risk management project approved through the business case submitted by a local authority.
46. Welsh Government will provide revenue funding to 85% of the capital value of the coastal scheme as a contribution towards the cost of construction work over a 25-year period from the start of the 2022/23 financial year in which work will commence. This un-hypothecated funding will be paid through the Revenue Support Grant (RSG), to support the level of borrowing which will need to be undertaken by the Council. The risk of borrowing in terms of timing and interest costs remain that of the local authority.
47. The constructions costs are the tendered cost from the successful contractor and an additional cost relating to risks delivering the scheme in the form of a risk register approved by Welsh Government within the full business case. This provides a defined cost for the scheme which will be used to determine the upper limit contribution made by Welsh Government. If costs of the project exceed the defined cost of the scheme, all costs will need to be met by the Council in full. No additional WG funding would be available.
48. Cardiff Council will be responsible for funding 15% of the total cost of the scheme following the tender award plus 100% of any costs over those identified in the risk register.
49. Funding for the coastal scheme is comes from supported borrowing from Welsh Government and a Council contribution. The Council contribution is above the levels identified in the Capital Programme. The additional funding to meet the Council's contribution will be managed using earmarked reserves and prioritisation of unallocated grant as set out in the financial implications. Any further costs in excess of the estimate will require movement within the existing approved Capital programme including budgets relating to Council maintained assets in Highways.

### Revenue implications for ongoing maintenance

50. The future maintenance costs per annum have been estimated at £165,000 per annum or £16.5M for the 100-year life of the asset.
51. Like structures, such as bridges, the maintenance costs for the flood defences would not be evenly spread across the life of the asset and there would be key intervention periods for maintenance work. The flood gate for the Cardiff Sailing Club will be maintained as part of the highway asset.

### Ongoing risks to Lamby Way Landfill and infrastructure

52. Two slips have occurred along the riverbank edging to Lamby Way Tip. Geomorphological assessment verified that an additional section not within the outline business case should be included. This led to the addition of erosion protection works to the meander opposite the sailing club.
53. This protection work has been removed from the contract due to constraints of budgets and Welsh Government confirming this element would need to be funded 100% by Cardiff Council.
54. The infrastructure will continue to be monitored and any protection works required will need to be undertaken by a separate contract.
55. The Flood Management Team will undertake a separate exercise to ascertain the ongoing risks associated to Lamby Way Landfill and associated infrastructure.
56. The cost to protect Lamby Way landfill site and associated infrastructure is estimated at over £10M. However, a decision may be made to protect the infrastructure at a lower level as the Council would not need to meet the Welsh Government requirements from Coastal Risk Management Programme funding and there is significantly less risk to residential properties.

### **Local Member Consultation**

57. The Flood and Coastal Risk Management team consulted the relevant local members from Rumney, Splott, Trowbridge, Adamsdown and Penylan. These wards are impacted by the extent of flooding, if a scheme did not proceed.
58. Local Members have received updates as the scheme has progressed with the latest consultation taking place on 18<sup>th</sup> May 2021 in relation to the principle design for the coastal protection scheme.

### **Scrutiny Consideration**

59. The Coastal Risk Management Programme was scrutinised by Environmental Scrutiny Committee on 6th March 2018. The Environmental Scrutiny Committee will consider this report on 26 September 2022. Any comments received will be report to the Cabinet meeting.

## **Reasons for Recommendation**

60. To note the revised design for the coastal protection scheme and the financial requirements within the full business case to be submitted to Welsh Government for the Coastal Risk Management Programme.
61. To approve the delegation of the award of contract following Welsh Government approval of the Full Business Case, to deliver the coastal defence improvements.
62. To commit to the funding contribution for the construction coastal protection scheme.

## **Finance Implications**

63. Finance implications are contained within confidential Appendix 1.

## **Legal Implications**

64. The report recommends, amongst other things, commencing procurement. The estimated value of the procurement is such (above threshold) that the contract must be procured in compliance with one of the competitive procedures set out in the Public Contracts Regulations 2015 ('PCR'). In this case it is proposed that a provider will be secured by using the Open procedure under the PCR. The use of the Open procedure should meet the PCR requirement but please note:-
  - i. All interested parties can submit a tender – if this is an active market with many potential bidders then the process could prove cumbersome in terms of the number of bids received . Conversely if there are few potential bidders then this should not prove a problem.
  - ii. If the Open procedure is used then no negotiation with bidders is permitted.
  - iii. The procedure tends to be most suitable where tenders will be easy to evaluate.
  - iv. All tender documentation will be required to be available at the date the contract notice is published . Legal advice should be sought on the procurement documents including the form of contract.
65. It is noted that the service area wishes to use the NEC4 option C form of contract. Further legal advice should be sought but generally, Under Option C, the Client and the Contractor agree a target price. In addition, they agree their respective shares of any savings made if the "actual" price of carrying out the works is less than the target price, or any overrun if the target price is exceeded. Option C therefore provides a means by which financial "pain" and "gain" are shared between the Client and the Contractor.
66. Some of the key points to note about Option C are that:
  - i. the target price is subject to adjustment as a result of compensation

events, such as changes/variations to the Scope;

- ii. the Contractor is paid the full cost of carrying out the works (subject to any Disallowed Cost) plus its Fee, regardless of the target price, until completion of the whole of the works. Following that the Contractor's share of any savings or overruns assessed and taken into account by way of a payment adjustment ;
  - iii. any target price should be set at a realistic level.
  - iv. The practical operation of Option C requires considerable management input, particularly on the part of the Project Manager in assessing amounts due to the Contractor
  - v. Consideration will be required as to what options , additional clauses and amendments (if any) are to be made to the standard form . When matters were previously tendered the contract terms did not contain optional clause X1 (price adjustment for inflation) and consideration will need to be given to how risk is to be allocated in this regard.
67. The Council (as the relevant Coast Protection Authority) has a discretionary power for managing coastal erosion under the Coast Protection Act 1949 ("the CPA") The powers set out in the CPA allow the Coast Protection Authority to carry out capital works and along with The Coast Protection (Notices) (Wales) Regulations 2003 it sets out the procedural requirements. These requirements include the service of notices and the consultation requirements, the management of objections and payments compensation together with the requirement for consents from other bodies (in this instance NRW), that will need to be complied with. Where capital works are to be carried out on land that is not in Cardiff Council's ownership then the consent of third party landowners would need to be secured before any works are commenced. However, where an agreement cannot be reached then section 25 of the CPA contains powers of land entry (although this default entry power is not applicable to Crown land). Any acquisition of land or rights for the purposes of the works will need to comply with the Council's Acquisition and Disposal of Land Procedure Rules with regard to obtaining best value. It is recommended that the award of any contract for works takes into account timescales and possible delays arising from any requirement for access or acquisition of a purchase in land, and for any approval of a scheme works authorised the CPA, planning permission and other statutory authority required, such as marine licences, that may delay works being undertaken.

### Grant

68. It is noted that the contract will be partly funded by way of a grant made available through the Welsh Government. Accordingly, the Service Area will need to be satisfied that the Council can comply with any grant conditions attached to the funding.
69. It is recommended that the advert and procurement documents make it clear that the award of contract is subject to grant funding.

## Equality Duty

70. The Council has to satisfy its public sector duties under the Equality Act 2010 (including specific Welsh public sector duties) – the Public Sector Equality Duties (PSED). These duties require the Council to have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of ‘protected characteristics’. The ‘Protected characteristics’ are: • Age • Gender reassignment • Sex • Race – including ethnic or national origin, colour or nationality • Disability • Pregnancy and maternity • Marriage and civil partnership • Sexual orientation • Religion or belief – including lack of belief.

## Well-Being of Future Generations (Wales) Act 2015 - Standard legal imps

71. The Well-Being of Future Generations (Wales) Act 2015 (‘the Act’) places a ‘well-being duty’ on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible.
72. In discharging its duties under the Act, the Council has set and published well being objectives designed to maximise its contribution to achieving the national well being goals. The well being objectives are set out in Cardiff’s Corporate Plan 2022-25. When exercising its functions, the Council is required to take all reasonable steps to meet its well being objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the well being objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.
73. The well being duty also requires the Council to act in accordance with a ‘sustainable development principle’. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:
- Look to the long term
  - Focus on prevention by understanding the root causes of problems
  - Deliver an integrated approach to achieving the 7 national well-being goals
  - Work in collaboration with others to find shared sustainable solutions
  - Involve people from all sections of the community in the decisions which affect them
74. The decision maker must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible using the link below:  
<http://gov.wales/topics/people-and-communities/people/future-generations-act/statutory-guidance/?lang=en>

### General

75. The decision maker should be satisfied that the procurement is in accordance within the financial and budgetary policy and represents value for money for the council.
76. The decision maker should also have regard to, when making its decision, to the Council's wider obligations under the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards.

### **Property Implications**

77. Strategic Estates have assisted the Coastal Risk Management Team to identify land ownership details relevant to the proposed scheme.
78. A mix of Council and privately owned land is potentially affected, the full impact of which needs to be explored in further detail, particularly in regard to Council managed operational and leased assets. For example it is noted Lamby Way is excluded from the scheme, a key operational asset where it is important to understand short, medium and long-term implications..
79. It is advised the project team engage with strategic estates as part of the governance of the scheme to review all land and property matters and fully understand the strategic and transactional implications.
80. Where there are any property transactions or valuations required to deliver any proposals, they should be done so in accordance with the Council's Asset Management process and in consultation with Strategic Estates and relevant service areas."

### **HR Implications**

81. There are no HR implications to be considered in this report.

## **RECOMMENDATIONS**

Cabinet is recommended to:

1. approve the revised design for the coastal protection scheme and the full business case to be submitted to Welsh Government for the Coastal Risk Management Programme.
2. Approve the commitment of the funding contribution identified within the financial implications in Appendix 1.
3. delegate authority to the Director of Planning, Transport and Environment subject to consultation with the Cabinet Member for Climate Change, s.151 Officer and Director Governance and Legal Services, to deal with all aspects of contract award following the approval of the Full Business Case by Welsh Government.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>ANDREW GREGORY</b> Director Planning, Transport & Environment

Appendix A - Full Business Case

Appendix B – Technical Note on revised scheme

Appendix C - Marine License Order

The following background papers have been taken into account:

Cabinet Report 15<sup>th</sup> March 2018 – Coastal Risk Management Programme

Cabinet Report 17<sup>th</sup> June 2021 – Coastal Risk Management Programme – Full Business Case and Procurement of Construction Contract

National Strategy for Flood and Coastal Erosion Risk Management in Wales  
<https://gov.wales/national-strategy-flood-and-coastal-erosion-risk-management-wales>



Yn rhinwedd paragraff (au) 14, 21 Rhan (nau) 4 a 5 o Atodlen 12A  
o Ddeddf Llywodraeth Leol 1972.

Mae'r ddogfen yn gyfyngedig

Mae'r dudalen hon yn wag yn fwriadol

Yn rhinwedd paragraff (au) 14, 21 Rhan (nau) 4 a 5 o Atodlen 12A  
o Ddeddf Llywodraeth Leol 1972.

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o Ddeddf Llywodraeth Leol 1972.

Mae'r ddogfen yn gyfyngedig

Mae'r dudalen hon yn wag yn fwriadol

## **Marine Licence with introductory note**

The Marine and Coastal Access Act (2009)

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Licence Holder: Cardiff Council

Cardiff Council  
County Hall,  
Atlantic Wharf,  
Cardiff,  
CF10 4UW

Cardiff Coastal Defence Scheme

Licence Number: CML2147  
7 July 2022

Licence Number: CML2147

## Cardiff Coastal Defence Scheme

Marine Licence number: CML2147

### Introductory note

**This introductory note does not form a part of the marine licence**

The main features of the marine licence are as follows.

The scheme is to improve and extend the coastal and fluvial defences in Cardiff along the Rhymney and Severn Estuaries over an area of approximately 40ha.

The status log of the marine licence sets out the marine licence history, including any subsequent marine licence variation(s)

#### Status log of this marine licence

Description	Date	Comments
Application	Duly made 10/09/2021	Application received and considered to be duly made
Date licence determined	07/07/2022	Determination date

#### Related marine licences or applications under determination

Not applicable

End of introductory note.



**Licence Number: CML2147**

**MARINE LICENCE, NUMBER CML2147**

**1 LICENCE DETAILS**

**1.1 Marine Licence**

This is a licence granted by the Licensing Authority in respect of an application numbered CML2147 and duly made on 10 September 2021 and authorises the Licence Holder to carry on activities for which a licence is required under Part 4 of the Marine and Coastal Access Act 2009, (2009 Act). This licence should be interpreted in accordance with **Section 4**.

**1.2 Licence Holder**

The Licence Holder is the organisation set out below:

**Organisation name:** Cardiff Council

**Address:** County Hall, Atlantic Wharf, Cardiff, CF10 4UW

**1.3 Licence Validity**

Licence Start Date	07 July 2022
Licence End Date	06 July 2029
Licence Issue Date	07 July 2022

**1.4 Conditions**

This licence is subject to the conditions set out in **Section 3**.

**Signed:**



**Dr. Emmer Litt**

For and on behalf of the Licensing Authority

**2 LICENSED ACTIVITIES**

**2.1 Project**

Cardiff Coastal Defence scheme aims to improve the existing coastal and fluvial defences. The work comprises of the improvement of coastal flood defences along the Severn Estuary, west and east of its confluence with the Rhymney River, and sections of new fluvial defences along both banks of the Rhymney River from its confluence with the Severn Estuary to Lamby Way bridge over an area of approximately 40ha.

The following Licensed Activities can be conducted within the Licence Period, within the Licensed Area and in accordance with the Approved Application and the Approved Supporting Documents:

**Table 1 Licensed Activities**

<b>Activity 1 – Construction of Coastal Defence along the coastline</b>	
Type of Licensed Activity	Construction, Alteration or Improvement
Description	<ul style="list-style-type: none"> <li>• Installation of a sloping rock armour revetment of approx. 20m in width along the coastline: two sections of rock armour revetment (2.1km in length, crest of 3.5–4.3m and buried toe of 2.8m in width) with a maximum slope of 1:2.5.</li> <li>• A rock grading of 1 to 3 tonnes with scour protection at the toe embedded to approximately 1.0 metres and a geotextile membrane under the rock armour to stop sediment wash out.</li> </ul>
Material types to be removed or deposited	Geotextiles, topsoil, rock, timber, iron/steel, concrete
<b>Activity 2 – Construction of Coastal Defence along the riverbank of the Rhymney River</b>	
Type of Licensed Activity	Construction, Alteration or Improvement
Description	<ul style="list-style-type: none"> <li>• Dycel 220 Erosion protection blocks or similar installed along the slope of the bank with a granular fill and graded formation underneath.</li> <li>• Double layer 450 mm rock armour toe with a soil fill on top to anchor the blocks.</li> <li>• Further up the slope, chestnut stakes will be driven through the Dycel blocks with horizontal logs to be tied to the stakes and brush wood placed in between.</li> <li>• Mud will be placed on top of the Dycel blocks to allow natural re-vegetation.</li> </ul>

**Licence Number: CML2147**

Material types to be removed or deposited	Geotextiles, topsoil, rock, timber, iron/steel, concrete
<b>Combined Quantities and Dimensions for Activity 1 and 2</b>	
Quantities/Dimensions	Maximum of: 50,000 m <sup>2</sup> geotextile 10,000m <sup>2</sup> embankment fill material 3,000 m <sup>3</sup> topsoil 60,000 m <sup>3</sup> rock armour 15,000 m <sup>2</sup> scour protection 9,000 m <sup>2</sup> brushwood will be used to construct the revetments and the work along the bank of the Rhymney 31,000 m <sup>3</sup> of excavated material will be re-used on-site
<b>Activity 3 – Ground investigation work</b>	
Type of Licensed Activity	Removals
Description	Ground Investigation work consisting of boreholes and trial pits to determine the ground and groundwater conditions to inform engineering design of the coastal frontage (Activity 1 area)
Material to be removed	Sediment
Quantities/Dimensions	<ul style="list-style-type: none"> <li>Up to 8 boreholes to a depth of up to 15m (5 boreholes west of the Rhymney (location 7) and 3 boreholes to the east (location 6))</li> <li>Up to 12 trial pits to a depth of up to 3.5m (8 trial pits to the west of the Rhymney (location 7) and 4 trial pits to the east (location 6))</li> </ul>

**2.2 Licensed Area**

The Licence Holder is authorised to conduct Activity 1 and 3 described in Table 1 in the vicinity of Cardiff, adjacent to Rover Way, along the Severn Estuary Coastline, at Location 6 and 7 bounded by the coordinates in Appendix 1 and plan in Appendix 2.

The Licence Holder is authorised to conduct Activity 2 described in Table 1 in the vicinity of Cardiff, adjacent to Rover Way, along the Riverbank of the Rhymney River, at Location 1, 2, 3, 4 and 5 bounded by the coordinates in Appendix 1 and plan in Appendix 2.

In the event of any discrepancy between the coordinates in Appendix 1 and the plan attached at Appendix 2, the coordinates shall take precedence.

**2.3 Approved Supporting Documents**

**Licence Number: CML2147**

<b>Title/Description of Document</b>	<b>Date submitted</b>
Cardiff Coastal Defences Area of Permanent Works	10/09/2021
Cardiff Coastal Defences Area of Temporary Works	10/09/2021
Cardiff Coastal Defences Scheme Footprint Below HAT	10/09/2021
Cardiff Coastal Defences Scheme Footprint Below MHWS	10/09/2021
Cardiff Coastal Defences Construction Method Statement	10/09/2021
CCD-JBAU-00-00-AP-EN-0001-S3-P01-Marine_Licence_Additional_Sheets	10/09/2021
Water Framework Directive WFD	10/09/2021
Habitats Regulations Assessment HRA	10/09/2021
Environmental Statement ES – Split into 2 documents to keep file size below 10MB: CCD-JBAU-00-00-RP-EN-0002-S3-P04-Environmental_Statement Without Appendices	10/09/2021
Environmental Statement ES – Split into 2 documents to keep file size below 10MB: CCD-JBAU-00-00-RP-EN-0002-S3-P04-Environmental_Statement Apps E F G H and J	10/09/2021
Non-Technical Summary - CCD-JBAU-00-00-RP-EN-0003-S3-P01-Non-Technical Summary	10/09/2021
Environmental Statement Appendices – Separate Files	10/09/2021
Appendix A&B – Scoping Opinions	10/09/2021
Appendix C – Ecology Phase 1 map – ‘Phase 1 habitats and redline V2’	10/09/2021
Appendix D – Ecology SINC sites map – ‘Cardiff SINCS’	10/09/2021
Appendix I&K – GGAT Desk-based Assessment	10/09/2021
Appendix L – GI Report - CCD-JBAU-ZZ-00-RP-GT-0001-S3-P01-Ground_Investigation_Report	10/09/2021
Protected sites map – ‘Protected sites red line v2’	10/09/2021
NVC/Detailed Botanical Survey - CCD-JBAU-XX-XX-TN-EN-0001-S3-P01-Botany_Survey	10/09/2021
PEA - 2016s5078 Cardiff CRMP OBC - Preliminary Ecological Appraisal v1-2	10/09/2021
Contaminated Land Report - CCD-JBAU-ZZ-00-RP-GT-0002-S3-P01-Contaminated_Land_Review	10/09/2021
Engineering drawings showing details of the proposed scheme	10/09/2021
Location 11: CCD-JBAU-00-11-DR-C-1100-S3-P01 to CCD-JBAU-00-11-DR-C-1106-S3-P01	10/09/2021
Location 11: CCD-JBAU-00-11-DR-C-1150-S3-P01 & CCD-JBAU-00-11-DR-C-1151-S3-P01	10/09/2021
Location 12: CCD-JBAU-00-12-DR-C-1200-S3-P02 to CCD-JBAU-00-12-DR-C-1214-S3-P01	10/09/2021
Location 12: CCD-JBAU-00-12-DR-C-1250-S3-P01 & CCD-JBAU-00-12-DR-C-1251-S3-P01	10/09/2021
Location 21: CCD-JBAU-00-21-DR-C-2100-S3-P01 & CCD-JBAU-00-21-DR-C-2101-S3-P01	10/09/2021
Location 21: CCD-JBAU-00-21-DR-C-2150-S3-P01 & CCD-JBAU-00-21-DR-C-2151-S3-P01	10/09/2021

## Licence Number: CML2147

Location 22: CCD-JBAU-00-22-SK-Z-0005	10/09/2021
Location 31: CCD-JBAU-00-31-DR-C-3100-S3-P01 & CCD-JBAU-00-31-DR-C-3101-S3-P01	10/09/2021
Location 31: CCD-JBAU-00-31-DR-C-3150-S3-P01 & CCD-JBAU-00-31-DR-C-3151-S3-P01	10/09/2021
Location 32: CCD-JBAU-00-32-DR-C-3200-S3-P01 to CCD-JBAU-00-32-DR-C-3206-S3-P01	10/09/2021
Location 32: CCD-JBAU-00-32-DR-C-3250-S3-P01 & CCD-JBAU-00-32-DR-C-3251-S3-P01	10/09/2021
Location 42: CCD-JBAU-00-32-DR-C-3250-S3-P01	10/09/2021
Location 42: CCD-JBAU-00-42-DR-C-4250-S3-P01	10/09/2021
Location 52: CCD-JBAU-00-52-DR-C-5200-S3-P01	10/09/2021
Location 52: CCD-JBAU-00-52-DR-C-5250-S3-P01	10/09/2021
2019s0183 Cardiff Outline CEMP v2.0 11.3.2022	11/03/2022
2019s0183 Cardiff Outline SMP v3.0 11.3.2022 Final	11/03/2022
Proposed Sediment Sample Plan 1.0 28.01.2022	28/01/2022
CML2147 CCD-JBAU-XX-XX-RP-EN-0003-S3-P02-WFD	29/11/2021
NVC vegetation map	22/11/2021
CCD-JBAU-00-00-TN-EN-0002-S3-P01-PEA_Update	29/11/2021
CCD-JBAU-00-00-MP-EN-S3-P01-Intertidal_Phase_1_Habitats	29/11/2021
CCD-JBAU-XX-XX-TN-EN-0001-S3-P01-Botany_Survey	29/11/2021
CCD-JBAU-00-00-RP-EN-S3-P02-Addendum_to_ES__HRA_Coastal_Squeeze	22/11/2021
CCD-JBAU-00-00-TN-EN-0001-S0-P01-CS_numbers_clarification FINAL 10.12.21	10/12/2021
Planning, Design and Access Statement V1-0 / 16/07/2021	22/10/2021
WNMP signposting doc- 2019s0183 Cardiff 22.10.2021	22/10/2021
CCD-JBAU-XX-XX-RP-HM-0001-S3-P01-FCA_UPDATED	26/04/2021
CCD-JBAU-ZZ-00-SP-GT-2001-S3-P01-Phase2_GI_Spec	06/07/2022
CCD-JBAU-00-00-DR-GT-2001-S3-P01-Phase2_GI_Plan	06/07/2022
CCD-JBAU-00-00-RA-Z-2001-S3-P03-Phase2_GI_DRA	06/07/2022

### 3 CONDITIONS

#### Notification and Inspection

##### 3.1 Notification of Commencement

- 3.1.1 The Licence Holder must notify the Licensing Authority no less than **10 days** before the commencement of the Licensed Activities, or an individual phase of the Licensed Activities, is expected to commence.
- 3.1.2 The Licence Holder must notify Welsh Government Marine & Fisheries Division (Control & Enforcement Branch) no less than **10 days** before the commencement of the Licensed Activities, or an individual phase of the Licensed Activities, is expected to commence.
- 3.1.3 The Licence Holder must ensure that local mariners and fishermen's organisations are made fully aware of the Licensed Activities through local

## **Licence Number: CML2147**

notices to mariners **10 days** prior to the commencement of the Licensed Activities.

- 3.1.4 The Licence Holder must ensure that notification is sent to The Source Data Receipt team, UK Hydrographic Office (email: [sdr@ukho.gov.uk](mailto:sdr@ukho.gov.uk)) at least 10 days prior to commencement of the Licensed Activities. The information supplied must include the start date and end date, a description of the Licensed Activities, positions of the work area (WGS84), and details of any marking arrangements.

### **3.2 Notification of Vessels and/or Vehicles**

The Licence Holder must ensure that the details of the vessels and/or vehicles utilised to undertake the Licensed Activities are submitted to the Licensing Authority and Welsh Government Marine & Fisheries Division (Control & Enforcement Branch) at least **24 hours** prior to the commencement of the Licensed Activities.

### **3.3 Notification of Agents/Contractors/Sub-contractors**

The Licence Holder must ensure that details of any agent(s), contractor(s) or sub-contractor(s) utilised to undertake the Licensed Activities are submitted to the Licensing Authority at least **24 hours** prior to the commencement of Licensed Activities.

### **3.4 Notification of HM Coastguard**

The Licence Holder must ensure that HM Coastguard is made aware of the Licensed Activities at least **24 hours** prior to commencement by contacting The National Maritime Operations Centre at [zone27@mcga.gov.uk](mailto:zone27@mcga.gov.uk).

### **3.5 Inspection of Licensed Activities**

The Licence Holder must allow Marine Enforcement Officers or any other person authorised by the Licensing Authority to inspect the Licensed Activities at any reasonable time.

### **3.6 Notification of Completion**

- 3.6.1 The Licence Holder must notify the Licensing Authority within 10 days of completion of the Licensed Activities.
- 3.6.2 The Licence Holder must notify Welsh Government Marine & Fisheries Division (Control & Enforcement Branch) within **10 days** of completion of the Licensed Activities.
- 3.6.3 The Licence Holder must notify The Source Data Receipt team, UK Hydrographic Office (email: [sdr@ukho.gov.uk](mailto:sdr@ukho.gov.uk)) no later than **10 days** after the completion of the Licensed Activities. The information provided must include: any changes to engineering drawings, post dredge surveys, details of new or changed aids to navigation where applicable.

## **Licence Number: CML2147**

- 3.6.4 The Licence Holder must inform the Licensing Authority, of the location of all completed trail pits/boreholes within **10 days** of completion of the work.

### **3.7 Accident or Emergency**

- 3.7.1 If, by reason of force majeure any substances or articles are deposited otherwise than as permitted as part of the Licensed Activities or in the Licensed Area full details of the circumstances shall be notified to the Licensing Authority within **48 hours** of the incident occurring.
- 3.7.2 In case of damage to, or destruction or decay of the licensed activities, that could result in a danger or obstruction to navigation, notification must be issued to the Maritime and Coastguard Agency, Trinity House/NLB, the Kingfisher Information Service of Seafish and the UKHO, as soon as possible and no later than 24 hours following the identification of damage, destruction or decay. The Licence Holder shall lay down such buoys, exhibit such lights and take such steps as directed by Trinity House
- 3.7.3 If it is necessary for the Licence Holder to recover or remove any equipment, plant or machinery used to undertake the Licensed Activities that have been dropped as a result of an accident or emergency, the Licence Holder is permitted to do so provided that the methodology for such recovery or removal has been approved by the Licensing Authority.

### **3.8 Distribution of Copies of this Licence**

The Licence Holder is required to ensure that a copy of this Licence is given to:

- All agent(s), contractor(s) and sub-contractor(s) whose names have been provided to the Licensing Authority under condition 3.3 and
- The Masters of any vessels and transport managers responsible for the vehicles employed in accordance of this Licence whose details have been submitted to the Licensing Authority under condition 3.2.

### **3.9 Inspection of Documents**

Copies of this Licence shall be made available at the following locations:

- at the address of the Licence Holder specified in section 1.2;
- at any site office, located at or adjacent to the Licensed Area, used by the Licence Holder or its agent(s), contractor(s) or sub-contractor(s) responsible for the loading transportation or deposit of any substances or articles permitted as part of the Licensed Activities;
- on board each vessel or vehicle carrying out Licensed Activities.

## **Licence Number: CML2147**

The documents referred to in this Condition shall be available at all reasonable times for inspection by officers appropriately authorised by the Licensing Authority and authorised Marine Enforcement Officers at the locations stated in that paragraph.

### **Vessels, Plant and Equipment**

#### **3.10 Notified Contractors, Vessels and/or Vehicles only to Carry out Licensed Activities**

Only those agent(s), contractor(s), sub-contractor(s), vessels and/or vehicles whose details have been notified to the Licensing Authority may operate under the terms of this Licence. Any changes must be notified to and be approved by the Licensing Authority in writing prior to any such agent, contractor, subcontractors or vehicles carrying out any Licensed Activities pursuant to or otherwise operating under this Licence.

#### **3.11 Refuelling of Plant and Equipment**

The Licence Holder must ensure that plant, vehicles and machinery are not refuelled on the foreshore or in the sea.

#### **3.12 Equipment, Structures and Access**

The Licence Holder must ensure that all equipment, temporary structures, access tracks, waste and/or debris associated with the Licensed Activities are removed on completion of the Licensed activities.

### **Safety**

#### **3.13 Removal of Deposited Material**

If the Licensing Authority considers it necessary or advisable for the safety of navigation, the Licence Holder must remove any deposit specified by the Licensing Authority or Marine Enforcement Officers within one month of notice being given by the Licensing Authority, and shall not replace such material until the Licensing Authority has given its written approval.

### **Pollution control**

#### **3.14 Pollution Prevention**

The Licence Holder must ensure that pollution prevention best practice is adhered to at all times. Any incidents must be reported to the Licensing Authority as soon as possible using the hotline number **0300 065 3000**.

#### **3.15 Spillage of Pollutants**

The Licence Holder must employ bunding, storage facilities and spill kits to contain and prevent the release of fuel, oils and chemicals associated with the plant, refuelling and



## **Licence Number: CML2147**

construction equipment into the marine environment. Secondary containment must be used with a capacity of **no less than 110%** of the container's storage capacity

### **3.16 Prevention of Disposal of Man-made Debris**

The Licence Holder must ensure that all reasonable precautions are taken to prevent the disposal of man-made debris to the marine environment. Such material must be removed immediately and be disposed of appropriately. If it is not possible to prevent manmade debris from entering the marine environment during the Licensed Activities, the Licensed Activities must cease immediately.

### **3.17 Cleanliness of Equipment**

The Licence Holder must ensure that equipment, machinery and PPE are washed with freshwater and/or thoroughly airdried before deployment and before moving between locations.

### **Activity-specific Conditions**

#### **3.18 Construction Environmental Management Plan (CEMP)**

3.18.1 The Licence Holder must submit a CEMP to the Licensing Authority for written approval at least **6 weeks** prior to commencement of the Licensed Activities. The CEMP must be in accordance with the outline CEMP (2019s0183 Cardiff Outline CEMP). No Licensed Activities may be undertaken prior to written approval from the Licensing Authority.

3.18.2 The Licence Holder must ensure that any actions outlined in the documents detailed in condition(s) 3.18.1 are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.

#### **3.19 Biosecurity Risk Assessment**

3.19.1 The Licence Holder must submit a Biosecurity Risk Assessment to the Licensing Authority for written approval at least **6 weeks** prior to commencement of the Licensed Activities. No Licenced Activities may be undertaken prior to written approval from the Licensing Authority.

3.19.2 The Licence Holder must ensure that any actions outlined in the documents detailed in condition(s) 3.19.1 are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.

#### **3.20 Saltmarsh Habitat Management Plan**

## Licence Number: CML2147

3.20.1 The Licence Holder must submit a Saltmarsh Habitat Management Plan (to the Licensing Authority for written approval at least **6 weeks** prior to commencement of the Licensed Activities. The Saltmarsh Habitat Management Plan must be in accordance with the outline Saltmarsh Management Plan (2019s0183 Cardiff Outline SMP v3.0 11.3.2022 Final). No Licensed Activities may be undertaken prior to written approval from the Licensing Authority.

3.20.2 The Licence Holder must ensure that any actions outlined in the documents detailed in condition(s) 3.20.1 are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.

### 3.21 Written Scheme of Investigation (WSI)

3.21.1 The Licence Holder must submit a WSI to the Licensing Authority for written approval at least **2 months** prior to commencement of the Licensed Activities. No Licensed Activities may be undertaken prior to written approval from the Licensing Authority.

3.21.2 The Licence Holder must ensure that any actions outlined in the documents detailed in condition(s) 3.21.1 are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.

### 3.22 Sediment Sample Plan

3.22.1 The Licence Holder must ensure that sampling is undertaken in accordance with the sampling plan described in "*Proposed Sediment Sample Plan 1.0 28.01.2022*" and is analysed at an NRW approved laboratory.

3.22.2 The Licence Holder must submit the written results of the sediment sampling undertaken for written approval by the Licensing Authority prior to commencement of Licensed Activity 1 and 2. This must include an outline of an assessment of alternative uses for the sediment that is to be disposed. Licensed Activities 1 and 2 may not be undertaken prior to written approval from the Licensing Authority.

### 3.23 Use of Render and Concrete

The Licence Holder must ensure that no waste concrete slurry or wash water from the use of concrete or cement are discharged into the marine environment. Concrete and cement mixing and washing areas should be contained and sited at least **10 metres** from any watercourse or surface water drain to minimise the risk of runoff entering a watercourse.

### 3.24 Concrete Cure Time

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The Licence Holder must ensure materials used are suitable for use in the marine environment and works should be timed to ensure maximum concrete cure time.

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#### **4 INTERPRETATION**

In this Licence terms are as defined in section 115 of the Marine and Coastal Access Act unless otherwise stated.

- (a) **"2009 Act"** means the Marine and Coastal Access Act 2009;
- (b) **"Approved Application"** means the Marine Licence Application Form together with the Approved Supporting Documents;
- (c) **"Approved Supporting Documents"** means the documents supporting, or supplementary to, the Approved Application, submitted prior to the Licence Issue Date, listed in the Table at paragraph 2.3 above;
- (d) **"Commencement"** means the first undertaking of any Licensed Activities;
- (e) **"Force majeure"** may be deemed to apply when, due to stress of weather or any other cause, the master of a vessel determines that it is necessary to deposit the substances or articles because the safety of human life and/or of the vessel is threatened;
- (f) **"Licensed Activities"** means the activities authorised by this licence as specified in 2.1;
- (g) **"Licensed Area"** means the area within which Licensed Activities are authorised by this licence as specified in section 2.2;
- (h) **"Licence Holder"** means the person(s) or organisation(s) named in section 1.2 to whom this licence is granted;
- (i) **"Licence Period"** means the period beginning with the Licence Start Date and ending on the Licence End Date;
- (j) **"Licensing Authority"** means Natural Resources Wales acting on behalf of the Welsh Ministers;
- (k) **"Marine Enforcement Officers"** means the relevant officers appointed by Welsh Ministers under section 235 of the 2009 Act, contact details for whom are provided in section 5;
- (l) **"Marine Licence Application Form"** means the application form forming part of the application referred to in paragraph 1.1;

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- (m) **“Method Statement”** means the Method Statement(s) forming part of the Approved Application or Approved Supporting Documents;
- (n) **“Works”** means any construction activities comprised in the Licensed Activities and, where the context permits, includes any plant, equipment or materials used to carry out those activities or operations but excludes monitoring, minor routine maintenance or other ongoing operational activities following completion of any construction activities;
- (o) all times shall be taken to be the time in Greenwich Mean Time (GMT) on any given day;
- (p) all co-ordinates shall be taken to be latitude and longitude decimal degrees
- (q) in the event of any discrepancy between the coordinates listed in paragraph 2.2 and the plan attached at Appendix 1, the coordinates shall take precedence.

## 5 CONTACTS

Except where otherwise indicated, the primary point of contact with the Licensing Authority and the address for returns, correspondence and requests for variations of the licence is:

Marine Licensing Team  
Natural Resources Wales  
Permitting Service  
29 Newport Road  
Cambria House  
Cardiff  
CF24 0TP

Tel: 0300 065 3000

Email: [marinelicensing@naturalresourceswales.gov.uk](mailto:marinelicensing@naturalresourceswales.gov.uk)

**Welsh Government Marine Enforcement Officers may be contacted at:**

Welsh Government  
Suite 3  
Cedar Court  
Haven's Head Business Park

**Licence Number: CML2147**

Milford Haven Pembrokeshire  
SA73 3LS

Tel: 03000253500

Email: [wfmccmpc@gov.wales](mailto:wfmccmpc@gov.wales)

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**APPENDIX 1**

Coordinates (latitude and longitude decimal degrees) for the works:

Activity 1			
Location 6		Location 7	
lat	long	lat	long
-3.12304	51.49177	-3.1234	51.48777
-3.12311	51.49188	-3.12327	51.48692
-3.12233	51.49209	-3.12318	51.48608
-3.12136	51.49196	-3.12398	51.48513
-3.1199	51.49186	-3.12493	51.48386
-3.11805	51.49224	-3.12564	51.48341
-3.11753	51.49261	-3.12652	51.48267
-3.11537	51.49335	-3.12588	51.48177
-3.11457	51.4934	-3.12546	51.4809
-3.11426	51.49328	-3.12588	51.48005
-3.11526	51.49289	-3.12697	51.4789
-3.11678	51.49238	-3.12797	51.47821
-3.11766	51.4919	-3.12943	51.47732
-3.1194	51.49146	-3.13012	51.47614
-3.12048	51.4914	-3.1309	51.47618
-3.12208	51.49183	-3.13031	51.4775
-3.12304	51.49177	-3.12882	51.47836
		-3.12733	51.47956
		-3.12635	51.48052
		-3.1262	51.48133
		-3.1272	51.48244
		-3.1272	51.48297
		-3.12568	51.4839
		-3.12389	51.48599
		-3.12399	51.48765
		-3.1234	51.48777

Activity 2									
Location 1		Location 2		Location 3		Location 4		Location 5	
lat	long	lat	long	lat	long	lat	long	lat	long
-3.13475	51.49678	-3.1305	51.49582	-3.12646	51.49228	-3.13034	51.49102	-3.12701	51.48958
-3.13398	51.49678	-3.13033	51.49593	-3.12627	51.49234	-3.12997	51.49087	-3.12694	51.48948
-3.1334	51.4968	-3.12977	51.49569	-3.12583	51.49247	-3.13002	51.49081	-3.1268	51.48931
-3.13276	51.497	-3.12993	51.4953	-3.12544	51.49249	-3.13007	51.49077	-3.12652	51.48914
-3.13256	51.49696	-3.13052	51.4949	-3.12489	51.49232	-3.13022	51.49083	-3.12615	51.48898
-3.13231	51.49682	-3.12996	51.49463	-3.12449	51.49213	-3.13034	51.49089	-3.12575	51.48885
-3.13232	51.49676	-3.13034	51.49433	-3.12416	51.49195	-3.13038	51.49094	-3.12576	51.48883

**Licence Number: CML2147**

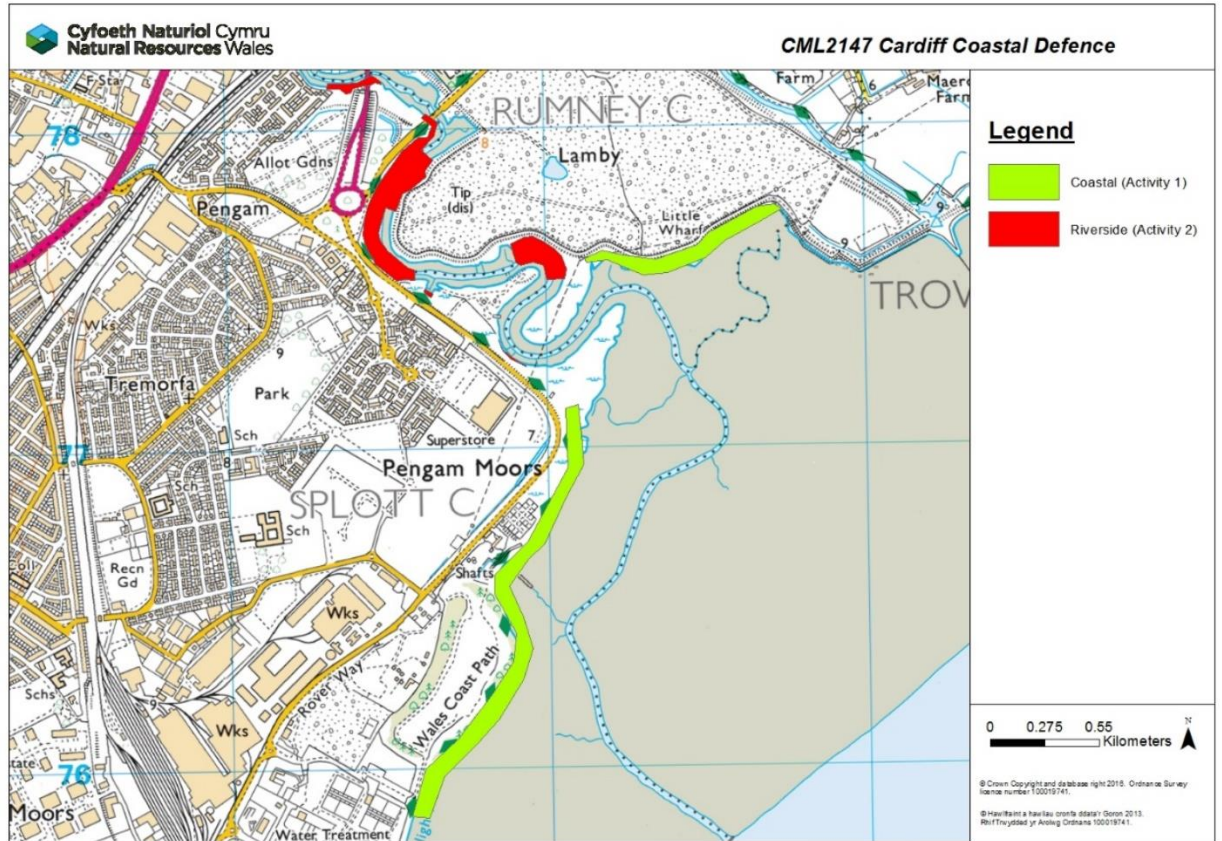
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		-3.13306	51.49296						
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		-3.13021	51.49527						
		-3.13003	51.49558						
		-3.1305	51.49582						



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APPENDIX 2

Cardiff Coastal Defence Marine Licence Activity map:



Mae'r dudalen hon yn wag yn fwriadol

**CARDIFF COUNCIL  
CYNGOR CAERDYDD****CABINET MEETING: 28 SEPTEMBER 2022**

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**THE RECYCLING STRATEGY FOR CARDIFF AND THE PROGRAMME FOR CHANGE****CLIMATE CHANGE (COUNCILLOR CARO WILD)****AGENDA ITEM: 3**

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**Reasons for this Report**

1. To report the outcome of the consultation on the draft Recycling Strategy 2022-25: 'Cleaner and Greener'.
2. To report the outcome of the segregated recycling pilot undertaken across 4,000 properties in Cardiff and the compositional analysis undertaken by WRAP.
3. To seek Cabinet approval for the Recycling Strategy 2022-25: 'Cleaner and Greener'.
4. To seek Cabinet approval on the following phased programme of change as part of the Strategy to improve recycling performance and to reduce the impact on climate change:
  - Phased roll-out of segregated recycling across all household properties in Cardiff commencing in 2022/23.
  - Extend the items that can be collected for recycling at the kerbside; such as, textiles and small electrical items.
  - Undertake further pilot work in relation to Houses of Multiple Occupancy (HMO's) and flats in relation to containers for segregation and communal segregated recycling bins.
  - Test and implement methods to reduce the amount of residual waste being presented, noting that between 60%-70% of current residual waste could be recycled. This will include trials such as households being limited to presenting two bags per fortnight, as well as trialling moving to three weekly collections in selected areas with wheeled bins.

- Enhance and strengthen the education and enforcement function to support improved compliance.
5. Note the plans to enhance the cleansing service, including the move balanced resourcing and 'same day cleanse' following collections for inner wards.
  6. Note the work to understand the future service demands for Recycling Centres in the city and the recommendation to develop a business case for a future repair and re-use 'superstore'.

## **Background**

7. Welsh Government is committed to Wales becoming a zero-waste nation as part of their Strategy to help save the planet. Significant policy development and investment has been made by Welsh Government to support local authorities across Wales to improve recycling performance and this has led to Wales becoming the third best nation in the world for recycling.
8. Cardiff Council, with the help of Welsh Government, has invested in its recycling services and as a result recycling performance has improved substantially over the last decade. Cardiff is now the best performing core city in the UK and one of the best performing cities for recycling across the whole of Europe. However, the city still has some way to go to meet the Welsh Government's statutory target of at least 70% of waste being recycled by each local authority by 2025.
9. At present, given the different set of challenges Cardiff faces, recycling performance in the city lags a little behind the other local authorities of Wales. By the end of the 2021/22 financial year the statutory recycling target for Wales was 64%. Cardiff achieved around 60%. In recent months, performance is moving closer to the 64% target, however the city is now required to work towards the 70% target which needs to be met by the end of the 2024/25 financial year. Failure to meet statutory targets can result in fiscal penalties being issued by Welsh Government. Based on the tonnage of waste handled by Cardiff Council each year this could amount to as much as £2million for each year that the target is not met. The Council remains in regular dialogue with the Welsh Government and the Waste and Resources Action Programme (WRAP) to demonstrate its commitment to meeting the statutory targets and to addressing the challenges that it faces. In bringing forward the Recycling Strategy 2022-25; 'Cleaner and Greener' the Council will be taking a significant step towards the Welsh Government blue-print for recycling in Wales.
10. The Council has already implemented some major changes to its waste collection services in recent years. The Council recently moved to a 4-day collection model collecting recycling and residual waste between 6:00am and 15:45pm on Tuesday to Friday. This has removed the amount of time recycling and waste is on the streets of Cardiff by 50% from the previous collection model and supports improvements in the proactive engagement and education of residents. The Council currently provides the following recycling and waste services for households across Cardiff:
  - Weekly food waste collections

- Weekly green bag collections for comingled recycling
  - Fortnightly garden waste collections in summer
  - Fortnightly residual waste collections
  - Fortnightly Hygiene collections (on request)
  - Bulky Waste collections (on request)
11. One of the most significant issues faced by Cardiff compared to the other local authorities of Wales is the high number of people living in flats and Houses of Multiple Occupation (HMOs) at circa 30% of total properties. These types of properties have a disproportionately high level of non-participation in recycling and where recycling does take place, there are high levels of contamination within co-mingled recycling.
  12. Cardiff also has a high proportion of HMO properties occupied by students. The short-term nature of student occupation also tends to result in low recycling performance outcomes and difficulties in bringing forward enforcement action.
  13. WRAP benchmarks the performance of Welsh local authorities for Welsh Government across a number of improvement areas. Key performance indicators set out by WRAP for Cardiff are as follows:
    - Kerbside residual waste above average per household: 249kg/hh/yr vs. national average of 227kg/hh/yr, and best performing at 193kg/hh/yr
    - Lowest amounts of dry recycling per household: 134kg/hh/yr compared to national average of 173kg/hh/yr, and best performing 206kg/hh/yr
    - Very high MRF reject – 8% of total waste arisings against national average of 2%.
  14. A recent compositional analysis exercise of household waste in Cardiff has shown significant amounts of recyclable material in both kerbside and communal residual / black bag waste:
    - 51.9% of communal collected residual waste contained target recyclable material (21% dry recycling, 30.7% food/garden waste)
    - 42.5% of kerbside collected residual waste contained target recyclable material (8.7% dry recycling, 33.8% food/garden waste)
    - An additional 21.2% of material from kerbside collected residual could be recycled at a Household Recycling Centre, and 7.6% could be diverted to the absorbent hygiene product (nappies and incontinence pad) collection (nappies and incontinence pad) collection
  15. The compositional analysis estimates the food collection service captures 62% of all food with high levels of food waste still presented in residual / black bag waste.

16. The compositional analysis of the green comingled recycling bags with Cardiff identified that:
  - 23.7% of items placed into green comingled recycling bags, collected from the kerbside were incorrect.
  - 41.4% of items placed into green comingled recycling bags, collected from flats were incorrect.
17. For this reason, 30% of material collected is lost for recycling, which is then used to Energy for Waste infrastructure to create energy rather than being used as a resource and made into new products. To put this into scale, this represents 10,000 tonnes of material lost in 2019/20.
18. Whilst educating residents and enforcing correct use (by issuing £100 fixed penalty notices) can play a part in changing behaviour, the Council understands that this can only be delivered at a small scale due to the resources required and as such wholesale changes are required to improve recycling performance.
19. Cardiff Council also operates an in-house trade waste service. The current level of recycling performance of 34% across the trade sector is significantly lower than the residential recycling performance. Trade waste represents circa 9% of the total of waste collected by Cardiff Council and the poor performance of this sector drags down the Council's overall recycling performance. Nonetheless, the Council remains committed to providing a trade waste service and to working with Welsh Government to improve performance in this area of its recycling work. The imminent introduction of dedicated statutory targets for trade waste by Welsh Government will help to accelerate an improvement in recycling performance. The Council's property estate, including schools, will also need to play an important part in driving improvements in recycling performance through the trade waste service.

### **Recycling Strategy 2022-25; 'Cleaner and Greener'**

20. Recycling Strategy 2022-25; 'Cleaner and Greener' is attached at Appendix A. The strategy aligns to the Corporate Plan 2020-2023 objective to make Cardiff a world-leading recycling city, alongside key commitments from the Beyond Recycling national strategy. It will ensure the Council continues to improve recycling services for residents and businesses.
21. The main objectives of the strategy are to:
  - Improve material quality
  - Increase recycling participation and capture of priority materials
  - Increase opportunities for communities and residents to recycle
  - Make use of all available data, to develop targeted actions
  - Reduce single use plastics
  - Encourage and support the prevention, reuse and repair of materials
  - Contribute towards developing a circular economy within Wales
  - Improve the Street Scene cleanliness across Cardiff

22. Alongside the aims and objectives of the strategy, there are a number of core actions, including expanding recycling services for residents, which will help deliver recycling performance improvements. These are outlined in Table 1 of the draft Recycling Strategy 2022-25 attached at Appendix A.
23. The strategy focuses on the future management of recycling and resources in Wales with a move towards a circular economy where materials are recycled within Wales to create economic growth and provide resilience to purchasing and importing resource into Wales.
24. The One Planet Cardiff Strategy has set out an objective to reduce single use plastics (SUP's), specifically green recycling bags. The use of reusable bags will address the 24 million single use green bags per annum for dry mixed recycling (DMR).
25. The Welsh Government target of zero waste by 2050 will move recycling down the hierarchy with the priority being on minimising the use of resources in the first place – Refuse, Reduce, Reuse, Repurpose and Recycle being the drivers to deliver these bold targets.

### **Consultation response to the draft Recycling Strategy 2022-25: 'Greener and Cleaner'**

26. The Council undertook a formal public consultation on the Recycling Strategy 2022-25: 'Greener and Cleaner' starting on 14<sup>th</sup> February 2022 for 6 weeks. The results of the consultation are set out in the report attached at Appendix B.
27. There were 3,305 responses to the consultation. To help gain a better understanding of the experiences and views of Cardiff residents an additional level of analysis has been undertaken that considers responses by deprivation quintile.
28. The main responses to the consultation are summarised as follows:

#### Recycling – Segregation and Quality

- 85% of respondents agreed Cardiff needs to improve the quality of material collected.
- 48.8% agreed with comingled recycling being split into three containers, 32% felt there should be different options for different areas of the city and 19.2% wanted full kerbside collection to be considered.
- 30.5% store recycling in an external bin or container, 24.8% keep their recycling inside until collection day, 15.2% store in a garage building and 29% store outside the property.
- 98% recycle every week.
- 91.1% indicated they participate in food waste collections.

- 77.7% would like to see additional materials collected from the kerbside for recycling.

#### Recycling – Information and education

- 35.1% feel the Council does enough to inform residents about how and what to recycle. Respondents proposed making better use of social media and other digital platforms, delivering more leaflets/letter to households, working with children, including schools and youth clubs and working with communities and volunteers to help deliver messages.
- 58.3% do not feel suitably informed about how to recycle different types of plastic.

#### Recycling and Re-use Centres

- 76.9% use a Recycling Centre with 91% stating the allowance of 28 visits per year is sufficient.
- 57.3% want more Recycling Centres in Cardiff with 51.7% wanting increased opportunities to donate items to be re-used.
- 88.8% would be interested in a re-use collection for large household items.

#### Single Used Plastics, Re-fill and Electric Vehicles

- 83.9% agree that the Council should be reducing its single use plastic impact, by moving to re-useable recycling containers.
- 72.1% would like to see increased re-fill zones throughout Cardiff.
- 85% agree the Council should look to move to electric vehicles.

#### Supporting citizens to do the right thing

- 84.3% think the Council should develop a Zero waste map, identifying recycling, re-use and re-fill locations across the city.
- 24.9% have volunteered to improve the local environmental quality of their area.

#### **A pilot of 3 stream segregated collection for glass, mixed containers (plastic and metal) and paper / cardboard; alongside the use of reusable bags**

29. A pilot of segregated collection for glass bottles and jars, mixed containers (plastic and metal) and paper / cardboard; alongside the use of reusable bags was undertaken by 4,000 properties in Llandaff, Radyr, Pentwyn and Trowbridge.
30. The pilot was for 4,000 properties (households with frontages only) and utilised the following:



- 1 x 90L red reusable sack for containers (plastic bottles, tubs, cans, tins and aerosols)
  - 1 x 90L blue reusable sack for paper and card (fibres)
  - 1 x blue caddy for glass bottle and jars
31. The objectives of the pilot were to:
- Measure material volumes to help determine future vehicle split
  - Monitor materials collected to assess whether contamination reduces and quality increases
  - Measure public satisfaction with reusable sacks
  - Identify any impact on Street Scene cleanliness
  - Identify appropriate round sizes for a 'one pass' three-stream recycling vehicle
  - Identify resources and costs required for change
32. The high-volume materials collected which influence vehicle design relate to paper and card (fibres) and containers (plastic bottles, tubs, cans, tins and aerosols). In the pilot the material split was approximately 65% paper and card and 35% containers.
33. The pilot demonstrated an uplift in the quality of materials received, reducing contamination to 6% compared to 30% for co-mingled recycling.
34. High level analysis from 2019/20 identified 10,000 tonnes of material lost to reject from comingled recycling. A reduction from 30% to 6% contamination would translate to a reduction in materials lost to reject of circa 2000 tonnes as well as delivering improvements to the city's carbon footprint by keeping resources in use.
35. The limited contamination within the segregated recycling generally related to a lack of understanding of what can be recycled, such as plastic bags compared to comingled recycling contamination which consisted of food, tissues, nappies etc.
36. As part of the pilot, the street scene was also monitored by cleansing services supervisors. Limited concerns were raised relating to litter from the re-usable bags. The improvement in relation to food contamination, alongside animal/bird-proof reusable bags meant there were no bags being ripped open.
37. The preferred vehicle, identified as the most successful for collecting segregated recycling, was a kerbside collection vehicle which could also support collection of other materials such as plastic bags, textiles, small electrical items.

## **Consultation response to the pilot of 3 stream segregated collection for glass, mixed containers (plastic and metal) and paper / cardboard; alongside the use of reusable bags**

38. The consultation response report for the pilot of 3 stream segregated collection for glass, mixed containers (plastic and metal) and paper / cardboard; alongside the use of reusable bags is Appendix C.
39. There were 332 responses to the consultation.
40. The consultation survey was undertaken relatively early to the pilot being implemented and therefore consideration of the early acceptance of change by residents needs to be recognised in relation to longer term acceptance.
41. The key responses to the consultation were as follows:

### Recycling – Segregation and Quality

- 37.2% stated they were satisfied with the segregation of recycling compared with 54.8% who felt dissatisfied. However, despite dissatisfaction which naturally comes with change, 90% of properties participated.
- Storage was the biggest concern with 74.3% of respondents reporting they had nowhere to store the sacks or caddy provided.
- 40% stated they found it difficult to use the sack or caddy due to a protected characteristic.
- 40% found the recycling 'too much effort'.

### Residual waste

- 67.3% stated they filled their residual bin compared to 32.7% who stated they had spare capacity within their residual bins,

### Reusable bags

- 67.8% stated the size of the blue sacks (paper and card) were about right with 10.9% stating they were too large and 21.3% stating they were too small.
- 65.4% stated the size of the red sacks (containers) were about right with 13.2% stating they were too large and 21.4% stating they were too small.
- The main concerns about the reusable sacks was around the quality/design and weight of the sacks to stop them blowing around.

### Storage of recycling

- Most respondents stored their recycling in their back garden at 35.5%

- 21.2% stated storage was a challenge for them.

### Collections

- 84.8% stated they would need a weekly collection of recycling.
- Only 39.9% put their glass bottles and jar caddy out every week.

### **The change programme to deliver improvements**

42. Delivery of the Recycling Strategy will require significant change to the Recycling and Neighbourhood Service. The programme for change will support the followings aims:

- To reduce the Council's and residents' impact on climate change.
- To improve recycling performance and to value resources by keeping them in use as long as possible and avoid waste.
- To provide sustainable improvements to services for the residents of Cardiff by delivering effective and efficient services within the set budgetary framework.

43. The main programme of change is as follows:

- i. Expand segregated recycling to households (excluding flats and HMO's) using re-usable sacks and caddies to reduce the need for single use plastic bags.
- ii. Review the expansion of kerbside collection services to cover items currently not collected at the kerbside.
- iii. Prioritise education and enforcement of food recycling to improve participation in the existing service and improve the current 62% capture.
- iv. Review of approaches to reduce residual waste to support improving compliance for recycling.
- v. Develop the business case to move from a Material Recovery Facility to a Material Handling Facility required to manage segregated recycling.
- vi. Improve recycling in flats and HMO's by the use of pilots to inform the business case and modelling for recycling from these properties.
- vii. Develop the business case for Recycling Centres and Re-Use Centres across Cardiff.
- viii. Deliver improvements to Street Scene Services to support improvements in cleansing and enforcement following collections.
- ix. Improvements to the trade / business waste model to improve recycling and meet new legislative requirements.

- x. Identification of wider Council / service area change to value resources and minimise the Council's impact on climate change.
44. A communication and information campaign will be designed to support residents to understand the changes they will need to make, and the reasons for them. The campaign will consider:
- Local communication and support to the specific area that is moving to a new system.
  - Working with community groups on aspects such as cultural and language barriers.
  - Face to face and street-level explanations and not just relying on printed information.
  - Utilising local members and community partners to support the changes
  - Having simple visual information sheets that can also be used via social media.
  - Being clear that the changes are linked to climate change and street cleanliness.
45. The business case and associated finance to deliver the change will be considered for each change or group of changes. The service is striving to deliver sustainable improvements with no or limited impact to the Medium-Term Financial Plan. However, the service recognises there will be a requisite for one-off funding to support the change programme, such as communication with residents and dedicated programme/project management.
46. There will be a need to have more vehicles and officers to deliver the service compared to comingled recycling. However, this will be offset by future reductions in the need to sort the comingled recycling at a material recovery facility and improvements in the income received for recycling collected.
47. As part of the delivery of improvements, the Service will utilise appropriate grant opportunities from Welsh Government to support the delivery of change and associated costs of the improvement where appropriate.
48. The above programme will mean significant change to residents, as well as services. Therefore, Recycling and Neighbourhood Services will need to continue to engage closely with residents and community groups. A waste and litter advisory group has recently been established to provide advice to the council from voluntary groups and partners.
49. The Council will also further develop its proactive programme of engagement with the local universities through the City University Strategic Partnership Board to work with students to improve recycling compliance.
50. The Supplementary Policy Guidance for the storage of recycling and waste will require to be updated in relation to the changes to inform new developments and modification of existing properties, such as houses of multiple occupancy.

## **Local Member Consultation**

51. The draft Recycling Strategy 2022-25 was published for public consultation through a resident survey on 14<sup>th</sup> February 2022 for 6 weeks. The feedback from the consultation supported the development of the final Recycling Strategy 2022-25 and the development of actions to deliver improvements.

## **Scrutiny Consideration**

52. Environmental Scrutiny Committee reviewed the consultation response report to the Recycling Strategy 2022-25 on 22<sup>nd</sup> July 2022. They will consider this report on 26 September 2022. Any comments received will be reported to the Cabinet meeting.

## **Reasons for Recommendation**

53. To report the results of the public consultation on the Recycling Strategy 2022-25; 'Cleaner and Greener' and to seek authority to implement the Strategy.

## **Financial Implications**

54. The report updates Cabinet as to the outcomes of the public consultation exercise on the draft Recycling Strategy 2022-25 and seeks approval for a phased programme of change to improve future recycling performance.
55. The statutory target is to achieve a recycling performance of 64% between 2019/20 and 2023/24. This increases to a target of 70% from 2024/25 onwards. The failure to meet the 64% target could result in a fiscal penalty of £2 million and this penalty will continue to be in place until recycling performance meets the statutory target level.
56. It is anticipated that the proposed service changes and the action plan as set out in the strategy will support an improvement in performance and reduce the risk of a future fiscal penalty. This position will need to be closely monitored and updated following any outcome of the ministerial review planned for later in the financial year.
57. The report does not set out the estimated costs of proposed service improvements and changes and does not identify any related additional funding demands. In approving this strategy, members should note it is proposed that business cases to deliver related change will be presented for consideration. This should be on a case-by-case basis, apply to all changes and improvements proposed as a result of service reviews, any future partnerships and modelling. Business cases must be robust, fully costed and affordable as part of the Council's overall budget framework and medium-term financial plan. Updates will be brought back as future papers to Cabinet.
58. Changes in strategy will result in a need for additional capital investment in vehicles, equipment and depot infrastructure. Any such investment must be considered in line with the Corporate fleet strategy currently under development and align with other corporate priorities including the One Planet Cardiff strategy.

59. This will include any proposals relating to vehicles which must be considered in line with the Corporate fleet strategy currently under development and align with other corporate priorities including the One Planet Cardiff strategy.
60. The report seeks approval for the proposed expansion of segregated recycling alongside the use of reusable bags and indicates that this proposal will require additional revenue funding for operatives and vehicle costs. These costs are not identified and it is proposed that increased costs of the expanded service will be offset by future savings from a reduced need for costs associated with the sorting of comingled recycling and increased income from the sale of higher quality recyclables. Further pilot work is additionally proposed in relation to Houses in Multiple Occupation and flats.
61. The report identifies that a further £800,000 is currently spent annually on purchasing and distribution of green recycling bags and proposes that this budget is repurposed to fund these service changes.

### **Legal Implications**

62. The Council, as a waste collection and waste disposal authority, has various duties under waste legislation with regards collection and disposal of waste. Generally, the Council has a duty to collect household waste and, if requested, commercial waste and industrial waste. The Council also has a duty to arrange for the disposal of controlled waste collected in its area by it, and for places to be provided at which persons resident in its area may deposit their household waste and for the disposal of waste so deposited.
63. The Council is also required to provide HWRC sites and is required to make arrangements including the area it is situated in, availability of such sites to deposit waste and free of charge to residents. Amongst other things, the arrangements (with regards HWRC sites) may restrict the availability of specified places to specified descriptions of waste.
64. Generally, the Council cannot charge for collection of household waste. However, one exception is the collection of bulky waste (as defined by controlled waste legislation). The Council can also charge for garden waste. Any charge should be reasonable.

### **Equality Duty**

65. In considering this matter, the Council must have regard to its public sector equality duties under the Equality Act 2010 (including specific Welsh public sector duties). This means the Council must give due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The protected characteristics are: age, gender reassignment, sex, race – including ethnic or national origin, colour or nationality, disability, pregnancy and maternity, marriage and civil partnership, sexual orientation, religion or belief – including lack of belief.

66. When taking strategic decisions, the Council also has a statutory duty to have due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage ('the Socio-Economic Duty' imposed under section 1 of the Equality Act 2010). In considering this, the Council must take into account the statutory guidance issued by the Welsh Ministers ([WG42004 A More Equal Wales The Socio-economic Duty Equality Act 2010 \(gov.wales\)](#)) and must be able to demonstrate how it has discharged its duty.

### **Wellbeing of Future Generations (Wales) Act 2015 - Standard legal imps**

67. The Well-Being of Future Generations (Wales) Act 2015 ('the Act') places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible.
68. In discharging its duties under the Act, the Council has set and published well being objectives designed to maximise its contribution to achieving the national well being goals. The well being objectives are set out in Cardiff's Corporate Plan 2021-24. When exercising its functions, the Council is required to take all reasonable steps to meet its well being objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the well being objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.
69. The well being duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:
- Look to the long term
  - Focus on prevention by understanding the root causes of problems
  - Deliver an integrated approach to achieving the 7 national well-being goals
  - Work in collaboration with others to find shared sustainable solutions
  - Involve people from all sections of the community in the decisions which affect them
70. The decision maker must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible using the link below: <http://gov.wales/topics/people-and-communities/people/future-generations-act/statutory-guidance/?lang=en>

## **General**

71. The decision maker should be satisfied that the procurement is in accordance within the financial and budgetary policy.
72. The decision maker should also have regard to, when making its decision, to the Council's wider obligations under the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards.
73. The report also sets out that consultation is going to be undertaken with the public. Any consultation must be adequate and fair. The carrying out of consultation gives rise to a legitimate expectation that the outcome of the consultation will be considered as part of the decision making process.

## **Property Implications**

74. The report does not include any direct property implications. Where there are any property transactions or valuations required to deliver any proposals in the future, they should be done so in accordance with the Council's Asset Management process and in consultation with Strategic Estates and relevant service areas.

## **HR Implications**

75. The information held within this report has been previously consulted on with the Trade Unions and employees within the service are aware of the proposed plans. This consultation will continue as the strategy is implemented with both trade unions and employees being kept fully up to date.
76. Any employee implications that arise from the strategy will be assessed as part of the full business cases for any changes. However, any changes for employees or additional resources required will be fully consulted on as part of the business cases and will be carried out in compliance with corporately agreed processes.

## **RECOMMENDATIONS**

Cabinet is recommended to:

- i) Note the results of public consultation on the draft Recycling Strategy 2022-25: 'Greener and Cleaner' attached as Appendix B.
- ii) Approve the Recycling Strategy 2022-25: 'Greener and Cleaner' attached as Appendix A.
- iii) Note the outcomes of the segregated recycling pilot undertaken by 4,000 properties.
- iv) Agree in principle to the programme of change set out in the Recycling Strategy 2022-25: 'Greener and Cleaner' and this report and delegate authority to the Director of Economic Development in consultation with the Cabinet Member for



Climate Change to roll-out the phased implementation of the programme including:

- The phased roll-out of segregated recycling as set out in this report across household properties in Cardiff.
  - The phased roll-out of reduced residual waste collections as set out in this report to improve the level and quality of recycling across household properties in Cardiff.
  - Undertake further pilot work in relation to Houses of Multiple Occupancy and Flats to improve recycling performance including the testing of communal segregated recycling bins.
  - Review the expansion of kerbside collection services to cover items currently not collected at the kerbside.
  - Enhance and strengthen education and enforcement to deliver improved recycling compliance across household properties in Cardiff.
  - Develop the business case to move from a Material Recovery Facility to a Material Handling Facility required to manage segregated recycling.
  - Improvements to the trade / business waste model to improve recycling and meet new legislative requirements.
  - Identification of wider Council / service area change to value resources and minimise the Council's impact on climate change.
- v) Note the plans to enhance the cleansing service, including the move balanced resourcing and 'same day cleanse' following collections for inner wards.
- vi) Note the development of a business case for a future repair and re-use 'superstore'. A further report will be brought regarding the business case.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>NEIL HANRATTY</b>
	Director Economic Development
	22 September 2022

Appendix A - Recycling Strategy 2022-25; 'Cleaner and Greener'  
 Appendix B - Consultation response report for draft Recycling Strategy 2022-25; 'Greener and Cleaner'  
 Appendix C - Consultation response report for the pilot of 3 stream segregated collection for glass, mixed containers (plastic and metal) and paper / cardboard; alongside the use of reusable bags

## Appendix D – Equality Impact Assessment

The following background papers have been taken into account:

The Recycling, Preparation for Re-use and Composting Targets (Monitoring and Penalties) (Wales) Regulations 2011

<https://www.legislation.gov.uk/wsi/2011/1014/contents/made>

Cardiff Council Waste Compositional Analysis. Waste composition analysis of kerbside collected and communally collected household waste in Cardiff. WRAP/resourcefutures. September 2021.

# The Recycling Strategy for Cardiff 2022-2025: Cleaner and Greener

FINAL VERSION



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## Foreword



**Councillor Caro Wild**  
Climate Change

The science is clear that we will soon be facing a point of irreversible and catastrophic climate change, unless we take drastic action now. Clearly, in an emergency, a business-as-usual approach is no longer sufficient and we cannot escape the fact that, as a city, Cardiff is emitting more than its fair share of carbon.

Nowhere is this more apparent than in the amount of waste we produce. It is, perhaps, the most visual example of our climate footprint and driving up recycling will make a major contribution to the planet as it conserves natural resources, reduces demand for raw material, saves energy and cuts emissions.

Tackling climate change will require bold leadership from Government at all levels, innovation and a step change in behaviour across the private sector and, crucially, small but important changes in how we live our lives.

We can be proud that Wales is playing a leadership role in designing and implementing some of the most sustainable recycling and waste strategies in the World. We are currently the third best nation for recycling worldwide with Cardiff performing well in relation to other core cities in the UK. We recognise, however, that we lag behind other authorities in Wales in terms of our recycling performance.

There are some major challenges we must recognise and address if we are to improve Cardiff's recycling performance.

- The amount of waste we are producing is increasing.
- We are not recycling as much as we can. A massive 70% of items inside our general waste could be recycled, either through kerbside collections or at the household recycling centres. Instead, this is sent to the incinerator.
- We are not recycling correctly. Including items which can't be recycled, such as food and nappies, in our green bags means that 30% of our recycling has to be sent to the incinerator.

This approach is fundamentally unsustainable. It's bad for the environment and it is bad for the public purse. We simply cannot continue to collect incorrectly presented waste at everyone's doorstep, have it sorted out or burnt.

There is a much more sustainable way of managing our waste, that vastly reduces our carbon footprint and respects the earth's valuable resources. This strategy sets out that approach.

We must reduce the amount we use and re-use wherever we can. This means segregating our recycling so it can be re-purposed and developing a circular economy where we properly manage waste as a valuable resource.

We have undertaken extensive consultation and engagement with residents on what a new approach might look like, and conducted pilots in different parts of the city. We know that there is support to making these changes, but we appreciate that these changes will not always be easy. Doing the right thing rarely is.

This strategy sets out what we can do, together, to:

1. Reduce our carbon footprint and help tackle climate change;
2. Make better use of materials and create a circular economy that will provide more jobs and a more sustainable economy;
3. Help make our streets cleaner by presenting waste properly so that it can be collected quickly and effectively.

At the heart of these changes will be our brilliant workforce who work tirelessly every day, in freezing winters and scorching summers, to clean up our city. As part of this strategy we will ensure that we continue to support staff and create the right working environment.

This strategy sets out the positive changes needed to make Cardiff a Stronger, Fairer and Greener City.

We need everyone to get behind it.

## Executive Summary

Cardiff is already one of the best cities for recycling in the UK and Europe. The purpose of The Recycling Strategy for Cardiff (2021-25) is to drive up our recycling performance even further.

This Strategy reaffirms our commitment to achieving the Welsh Government's statutory recycling targets and sets our intention to move 'Beyond Recycling' by keeping resources in use and avoiding waste. It also sets out how we will more effectively manage the city's waste to help meet the aims of our 'One Planet' strategy and support the transition to net zero Carbon by 2030.

The strategy focuses on three key areas of intervention:

1. Improving the recycling performance of the Council's Trade waste service.
2. Expanding the residential recycling service to include new segregation streams.
3. Diverting recyclable materials from the residual (non-recyclable) waste stream.

We know that there are a number of challenges facing us. Many of the challenges facing Cardiff, as a large urban area, are unique in a Welsh context. Issues such as a diverse housing stock, transient populations, a high proportion of businesses and a regular programme of major events present Cardiff with a range of challenges.

Alongside this, we know that the quality of our recycling is currently poor. Around 30% of the material within our green bags should not be there, meaning that materials that could be recycled have been contaminated and must therefore be burnt. That's almost 10,000 tonnes of valuable recycling material lost in 2021.

Worse still, if recycling bags contain material that shouldn't be there, such as food, it can be attacked by seagulls and other animals, creating an unsightly mess. Our dedicated team of waste collectors and committed network of volunteers work hard to clear Cardiff streets, but their job is made so much harder if we do not recycle properly.

Currently, we also provide over 27 million single use plastic bags a year for recycling. This simply needs to stop. Moving forward, the Council will need to provide re-useable containers which will be suitable for use across our diverse housing stock, in addition to encouraging the correct presentation of waste.

Finally, we know that 70% of the material within the general waste collected from the pavements could be recycled. We need to work with residents, alongside reviewing our collection methodology, to ensure that all of this material is recycled in the correct way.

Taken together, failing to recycle properly is bad for the environment, bad for the public purse and is bad for our local neighbourhoods. All these issues can be addressed by improving the quality of material by taking the actions set out in this strategy.



## 1. Aims, Objectives & Actions

The Aims of the Recycling Strategy are to:

1. Improve material quality
2. Increase recycling participation and capture priority materials
3. Increase opportunities for communities and residents to recycle
4. Make use of all available data, to develop targeted actions
5. Reduce single use plastics
6. Encourage and support the prevention, reuse and repair of materials
7. Contribute towards developing a circular economy within Wales

Alongside the aims and objectives of the Strategy, there are a number of core actions, which will help deliver Cardiff's vision. These are set out in Table 1 below.

**Table 1: Final Strategy Objectives and Actions**

Aims	Objectives
<b>Improve Material Quality</b>	Expand the recycling service to offer separate collection of glass ** (bottles and jars), fibres (paper and card) and containers (cans and plastics)
	Reduce compostable garden waste contamination, through education and enforcement strategies, and a full service methodology review
<b>Increasing Recycling participation and capture of priority materials</b>	Review Trade practices to improve performance and comply with non-domestic waste regulations. This will include changing collection methodology and targeting recycling contracts
	Relaunch an enhanced 'Really Rubbish' Campaign with schools and commercial trade to promote recycling services (and composting in Schools).
	Review recycling in flats and rented accommodation to increase performance, working with relevant partners such as Rentsmart Wales and WRAP Cymru
	Permanently adopt and enforce a no mixed bag/ bag sorting policy at Household Waste Recycling Centres.
	Review site layout and signage, booking in system and effective customer engagement at Household Waste Recycling Centres.
	Increase cleansing recycling performance through segregation of litter-picked waste and recycling litterbins
	Review residual waste provision and introduce measures to increase participation in food waste service
<b>Increase opportunities for communities and residents to recycle</b>	Implement static and mobile recycling facilities within local communities
	Expand Markets & collection opportunities for additional materials – Absorbent Hygiene Products (nappy and incontinence waste)/coffee pods/tetrapak/plastic film
<b>Make use of all available data, to develop targeted actions</b>	Undertake a Composition Analysis to determine the materials to target
	Monitor Participation to inform targeted activity
	Progress the Pink Sticker Campaign based on the principal of educate first, with removal of bins where there is repeat contamination Be Mighty Recycle Campaign/Keeping up with the Jones'
	Review all recycling contracts, to ensure minimum recovery rates are being met (where specified) and identify improved recovery
<b>Reduce single use plastics</b>	Implement re-usable containers for recycling
	Single use plastics strategy

	Expand water re-fill across the City, promoting re-usable bottles
<b>Encourage and support the prevention, reuse and repair of materials</b>	Wastesavers Reuse Centre at Lamby Way
	Collaborate on community activities such as Benthylg/Repair Café Wales
	CLARE Wales Repair Directory
	Develop a Zero Waste Map
	Develop a business case for a re-use/repair/education hub within the City
<b>Contribute towards developing a circular economy within Wales</b>	Work with partners- such as CLARE Wales- to develop regional solutions
	Continue existing processing partnerships, such as Prosiect Gwyrdd
	Take an active role in supporting the ‘Dyfodol Gwyrdd Glân’, / ‘Clean Green Future’ collaborative partnership for Welsh Local Authorities and the Welsh Government – seeking regional processing solutions for materials such as Absorbent Hygiene Products

## 2. National Context

The Recycling Strategy for Cardiff is framed by a range of legislative influences and national events (e.g. the COVID-19 pandemic) which shape and determine the waste produced and how it is processed.

This section of the strategy sets out the national context, recognising the contextual changes which can impact waste production, collection and end markets.

### 2.1 Legislative Drivers

The importance of the environment and the conservation of natural resources is increasingly recognised and supported by national and international policy and regulation, which aims to reduce the environmental impact of consumption and the production of materials.

In Wales, at the national level, there are two key policy documents to consider: Towards Zero Waste - The Waste Strategy for Wales (2010); and Beyond Recycling - A Strategy to make the Circular Economy in Wales a Reality (2021). These documents establish the key statutory performance requirements for local authorities in Wales, in support of the Welsh Government’s long-term ambition for a sustainable and waste free Wales. Other relevant Welsh Government and Central Government policies and legislative acts relating to sustainable development, improved environmental outcomes and addressing climate change include:

- The Waste (England and Wales) Regulations 2011
- Towards Zero Waste – The Waste Strategy for Wales (2010)
- Waste (Wales) Measure 2010
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016
- Climate Change Strategy for Wales

The Wellbeing of Future Generations Act is of particular importance in Wales with the sustainable development principles- as expressed through the Five Ways of Working- considered as part of the development of this strategy. The strategy also includes actions that are designed to improve economic, social and environmental outcomes.

## 2.2 Towards Zero Waste, a Circular Economy and Beyond Recycling

The Welsh National Waste Strategy, “Towards Zero Waste” was launched on 21 June 2010. The strategy set out a series of challenging statutory recycling targets, as outlined in Table 2 below.

**Table 2:** Statutory Recycling Targets

Target for LA Collected Waste	2019/20	2024/25
Minimum overall recycling	64%	70%
Maximum level of landfill	10%	5%
Maximum level of energy from waste	36%	30%
Biodegradable Landfill Allowance	33557t	-

Nationally, impressive progress has been made towards the targets, and Wales ranks as number 1 recycling nation in the UK, 2<sup>nd</sup> in Europe and 3<sup>rd</sup> in the World. Significant progress has also been made with regards to reducing reliance on landfill.

Although Cardiff has made substantial strides forward, in 2021/22 the city fell short of the 64% recycling target. As a result, the Council is now working closely with the Welsh Government to review a series of options to help improve recycling performance.

Looking to build upon the success of the previous strategy, the Welsh Government published their Circular Economy Strategy for Wales – Beyond Recycling, on 2 March 2021.

The national aim is to move to a circular economy in Wales, where waste is avoided and the things we use are kept in use as long as possible. This is an important part of the action needed on climate change. Welsh Government, and by extension Cardiff Council, is seeking to make the process of managing waste ‘Cleaner, Greener, Fairer’, through 6 core themes and 8 headline actions. The 8 headline actions are as follows:

1. Support businesses in Wales to reduce their carbon footprint and become more resource efficient
2. Provide the tools to enable community action
3. Phase out unnecessary, single use items especially plastic
4. Eradicate avoidable food waste
5. Procure on a basis which prioritises goods and products which are made from remanufactured, refurbished and recycled materials or come from low carbon and sustainable materials like wood
6. Strive to achieve the highest rates of recycling in the world
7. Reduce the environmental impact of the waste collection from our homes and businesses
8. Take full responsibility for the full lifecycle our waste

In addition to the themes and headline actions, the strategy sets a number of significant targets for Welsh Local Authorities:

**Table 3:** Beyond Recycling Targets

<b>By 2025</b>	26% reduction in waste
	Zero waste to landfill
	50% reduction in avoidable food waste
	70% recycling
<b>By 2030</b>	33% reduction in waste

	60% reduction in avoidable food waste
<b>By 2050</b>	One planet resource use
	62% reduction in the waste
	Zero waste
	Net zero carbon

Note: All waste reduction targets are set against a 2006-07 baseline

As the Welsh Government looks 'Beyond Recycling' to waste reduction and the circular economy, it is imperative that this strategy sets out not only how to achieve the current recycling targets, but also how the city will adapt to these new requirements in the future. Consideration must therefore be given to improving the quality of materials collected, waste minimisation through behavioural change and supporting community re-use and repair, the greener collection of materials and how we will work together with residents, partners and neighbours to meet wider goals and agendas.

## 2.3 Climate Change

Beyond Recycling, the Welsh Government strategy to make the circular economy a reality makes clear that:

*'We are still in the midst of a climate emergency: globally, we are experiencing unprecedented climate events; we are on track for temperature rises above 2°C; one million species are threatened with extinction due to climate change and the overexploitation of natural resources; and there is increasing evidence of the adverse impacts that plastic is having on the environment and living organisms. Here in Wales, we are already feeling the effects with flooding and other extremes of weather becoming more commonplace. These challenges bring important opportunities to positively shape our future.'*

Climate change is significantly impacted by unsustainable consumption and disposal practices. The circular economy approach is key to tackling over-consumption, whilst also instigating social and economic improvements for Wales. Small changes made across a city can have a big impact when it comes to slowing the negative impact of climate change.

By recycling material in 2020/21, Cardiff's residents avoided 36,000 tonnes of CO2 emissions being released into the atmosphere ([www.myrecyclingwales.org.uk](http://www.myrecyclingwales.org.uk)). Increasing the city's recycling rate, and reducing waste sent to energy recovery facilities throughout the life span of this strategy will continue to further reduce CO2 emissions and help make Cardiff a net zero city by 2030.

## 3. Local Context

### 3.1 Current Service Provision

Cardiff provides the following services as part of its household waste and recycling collection scheme:

- Weekly collection of mixed, dry recyclables in green, single use bags. There is no limit to the amount of bags that are collected per property.
- Weekly collection of food waste using a brown 25 litre kerbside caddy. Kitchen caddies, and biodegradable kitchen caddy liners are provided free of charge.
- Compostable garden waste is collected within a 240L green bin, or 90L white re-useable sack (in areas where wheeled bins are not suitable). Up to 2 green bins, or 5 re-useable sacks will be collected per property. Garden Waste is collected fortnightly in the spring/summer, and less often in the winter. There is no annual charge for the collection of garden waste, though additional or replacement containers are chargeable.
- Non-recyclable waste is collected in a 140L wheeled bin, or up to 3 black bags for properties that cannot have a wheeled bin. Residual waste is collected fortnightly. Additional capacity is provided, via a recycling officer assessment. No additional bags next to bins are collected, and bin lids must be fully closed.
- Hygiene waste (child nappies, incontinence pads and associated changing waste) is collected fortnightly, on the opposite week to non-recyclable waste. Residents need to sign up to this service.
- Bulky waste collections can be booked in advance via the contact centre, mobile app or website. Items that can be fully recycled, with high recovery rates and limited disposal fees, are collected free of charge. Non-recycled items are collected at a pricing structure of up to 2 items for £12.50, increasing to a maximum of 6 items.

In addition to the above, Cardiff Council provides two Household Recycling Centres, one at Lamby Way and one at Bessemer Close. The Recycling Centres have recycling facilities for over 20 items. Residents must book to visit, and are limited to 26 visits per year as standard (by car). Van bookings are further restricted to 12 visits per year, and 1 per month. Mixed bags of waste are not accepted. Residents must sort waste before arrival, and we will explore the opportunity to provide facilities to allow them to sort waste on site.

A trade weighbridge service is also provided at Bessemer Close, which is a chargeable outlet for businesses to recycle and dispose of a variety of materials.

#### What happens to the material collected?

Cardiff works in partnership with neighbouring local authorities, to process and sort material within our own boundaries.

Food waste is taken to an Anaerobic Digestion plant, run by Welsh Water. Here, food waste breaks down without oxygen aided by heat. Through the anaerobic digester, gases produced are harnessed to make heat and electricity whilst creating a fertiliser from any remaining product to be used in agriculture.

Mixed dry recyclables are taken to the Council's Materials Reclamation Facility (MRF) at Lamby Way, Rumney. Through a mixture of machine and hand sorting, materials are

separated and baled to move onwards to processors to be recycled into new products. You can find out where your recycling goes at [www.myrecyclingwales.org.uk](http://www.myrecyclingwales.org.uk)

The MRF is run effectively by a dedicated team of staff, working in a challenging environment. This challenge is further exacerbated by the level of incorrect items that are placed into green recycling bags. While the equipment and staff are able to deal with commonly misplaced items such as flexible plastic, they are not able to deal with dirty contamination such as food waste and nappies. Not only do these reduce the quality of material, and impact the machinery, they also have a negative impact on the environment our staff work in.

In addition, as the City has grown and amounts of recycling collected increased, space and ability to process all recyclable material has become a challenge. Infrastructure change is needed, and the Council is working with WRAP Cymru and Eunomia to complete a review to ensure our recycling facilities are fit for the future.

Garden waste is taken to a composting site at Lamby Way, where it is turned into soil improver through an open windrow process. The material is delivered to site, where it is then shredded, piled into windrows and regularly turned. The whole process is natural, with natural heat generated and breaking down the material. At the end of the process, the material is separated into different size fractions via a trommel screen, and moved on to the product market. The compost is also provided to a number of community facilities and schools on request, such as the new Railway Gardens site and to fill Love where you Live community planters.

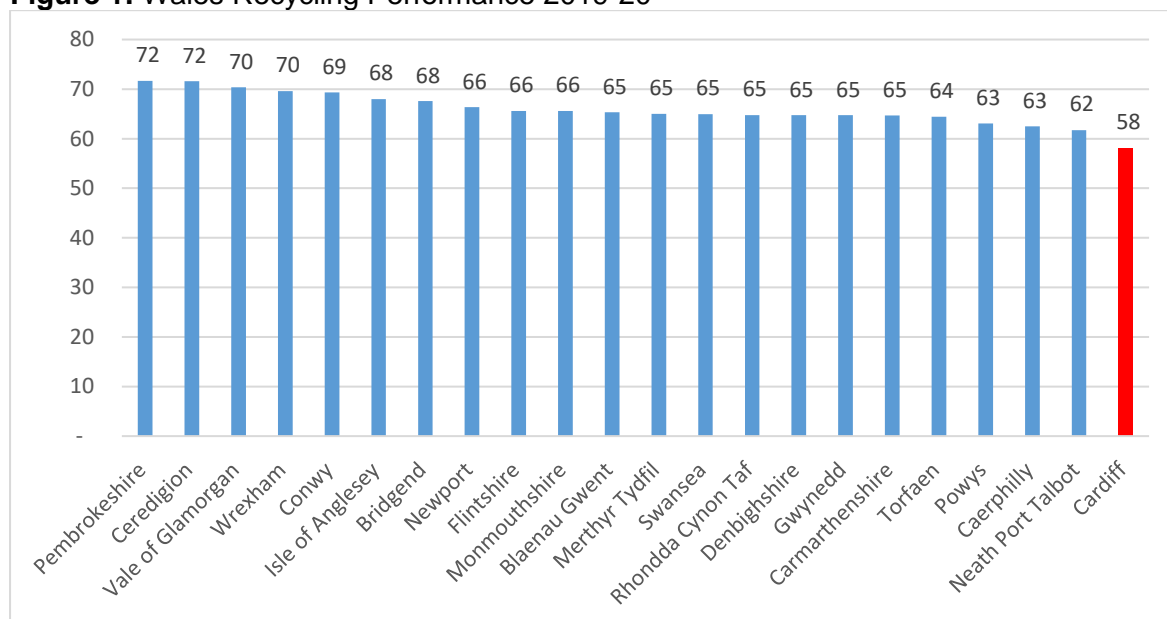
Non-recyclable waste is taken to an Energy Recovery Facility - run by Viridor - where it is used as fuel for energy recovery. The facility generates 250GWH of electricity for the national grid, which is enough to fuel 68,000 homes. Energy recovery works by burning waste at high temperatures, under carefully controlled conditions. The electricity produced is fed into the national grid. The process also produces 'bottom ash' which can be recycled as aggregate material as well as transporting remaining metal on to metal processors.

You can see a short video of the journey of Cardiff's waste here: [Cardiff's Waste Journey / Siwrnai Gwastraff Caerdydd \(English\) - YouTube](#) or visit [www.youtube.co.uk](http://www.youtube.co.uk) and search 'Cardiff's waste journey'

## 3.2 Current Performance and Comparisons

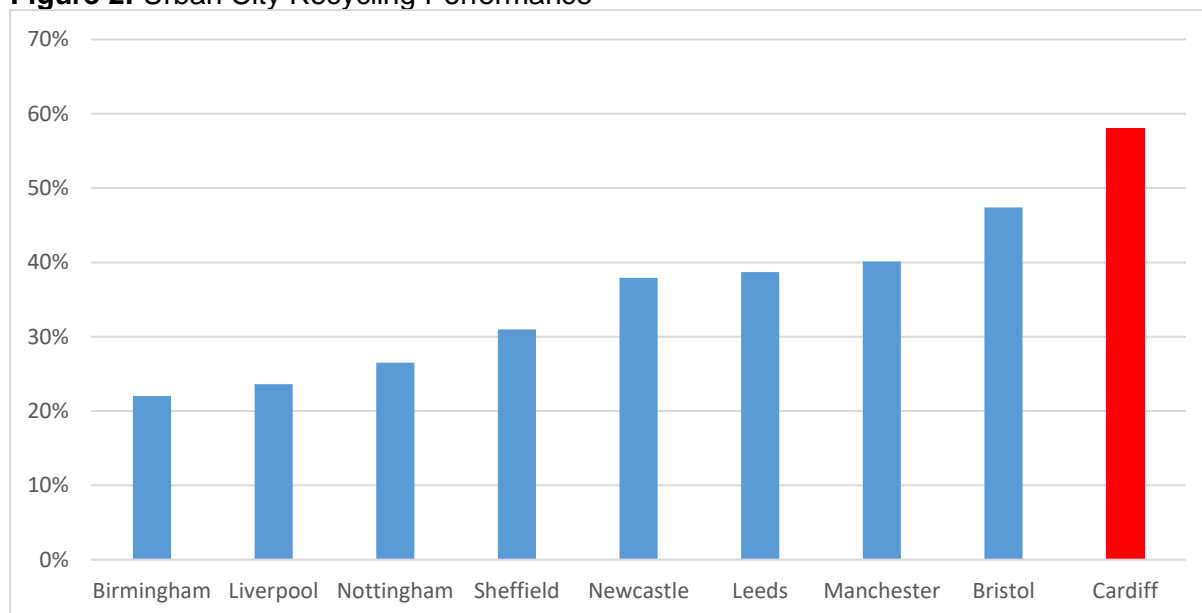
On 26 November 2021, the final validated 2019-20 Local Authority Recovery Target (LART) figures from Natural Resources Wales (NRW) were published. The figures are produced under NRW's duties as the Monitoring Authority as specified in the Recycling, Preparation for Re-use and Composting Targets (Monitoring and Penalties) (Wales) Regulations 2011. As Figure 1 shows, Cardiff did not meet the 2019-20 statutory minimum target for the percentage of municipal waste which must be recycled, Measure 2010. Cardiff's recycling performance in 2019-20 was validated at 58.14%, nearly 6% below the statutory target of 64%.

**Figure 1: Wales Recycling Performance 2019-20**



The Council understands the need to deliver another step change in performance. However, as the largest authority in Wales, with the biggest urban mass and highest density of businesses, there are very specific characteristics that make meeting the statutory recycling targets challenging. Larger, more urban cities, will naturally face greater challenges when it comes to increasing recycling performance. When compared to core cities across the UK, Cardiff's kerbside recycling performance compares very well (see Figure 2).

**Figure 2: Urban City Recycling Performance**



Note: The data for English authorities only includes household waste, whereas Welsh data incorporates all municipal waste (i.e. cleansing and Trade waste).

Despite falling short of the Welsh Government's target, Cardiff has areas of strength. In 2021/22, Cardiff saw a 9% increase in food waste collected from the kerbside and a 4% reduction overall in the amount of waste collected from the kerbside. Improvements to the operating of the Household Recycling Centres now sees recycling performance at over 87% with a 74% reduction in non-recyclable waste since the implementation of new controls.

A recent compositional analysis of green bags across the City found that there was 41.4% contamination in dry recycling bags collected from flats compared with 23.7% contamination in green bags collected from households.

The compositional analysis (Appendix 6) also indicates that there are still large volumes of food waste and recycling entering the residual waste stream. Waste collected from flats had the highest proportion of recyclable materials with 51.9% of the residual waste stream containing target recyclable material. Residual waste collected from households contained 42.5% target recyclable material (a large proportion of which was food waste). Whilst there is less recyclable material in household collected waste than there is in the flats collected waste, it is evident that there is still a significant amount of target material going to waste.

It is therefore essential that as well as improving material quality, we increase the amount of material segregated for recycling at the kerbside.

### 3.3 Achievements to Date

Whilst Cardiff has not yet met the 64% target, Cardiff Council remains fully committed to working collaboratively to improve recycling performance and to meeting both the 64% and 70% statutory performance target by 2024/25. Improvements to waste management and recycling performance are a fundamental part of the city's strategy.

The approach being taken is to look at the whole life of recycling materials; from supporting resident participation and behaviours, implementing efficient and effective collections to supporting ongoing participation, and managing how and where materials are recycled to deliver a circular economy and to reduce the associated carbon impacts.

A number of improvements have been introduced since the last strategy enabling the majority of aims set out in the Waste Strategy for Cardiff 2018-21 to be achieved. A full gap analysis has been undertaken, comparing performance against the objectives set out in the last strategy, attached at Appendix 1. The most significant achievements include:

- Introducing a segregated recycling trial at 4000 properties, consisting of separate containers, fibres and glass collections (following on from a separate glass collection pilot)
- Expanding the wheeled bin service where possible, reducing the number of single use bags provided for residual waste.
- Introducing a 4 day collection week, involving:
  - Rezoning the city and increasing round efficiency
  - Removing double shifting of vehicles and staff, meaning better opportunity for vehicle maintenance.
  - Removing the confusion around Bank Holiday Monday collections
  - Improving Value for Money
- Establishing a Reuse Facility at Lamby Way Recycling Centre in Partnership with Wastesavers (September 2021). Since opening, this facility has diverted 67t from the household recycling centres for re-use
- Introducing new controls at the Recycling Centres to facilitate an increase in recycling performance from 73% to 87%, including a no mixed bag policy, improved signage and recycling availability and booking system. This means that Cardiff is now has one of the best recycling performance for a Recycling Centre across Wales.



- Expanded Trade skip service to facilitate recycling skips.
- Developed new recycling infrastructure at hubs to facilitate small electrical items, printer cartridges, batteries and CDs/DVDs/Books recycling (collecting over 500KG so far).
- Continued to work with WRAP Cymru to undertake a review of potential waste collection systems, comparative costs and benefits.
- Commenced a full trade waste, and material processing review with WRAP Cymru.
- Introduced 12 electric vehicles to the service fleet, with 5 more eRCVs on order.
- Introduced a system to facilitate the recycling of materials collected during community litter picks.
- Implemented the 'Pink Sticker' campaign to highlight recycling containing non-recyclable materials. This supports the engage, educate, empower and enforce model for behaviour change, to improve behaviours towards recycling and reduce recycling contamination.
- Allowed asbestos to be accepted at Recycling Centres to tackle the negative impact of asbestos contamination on garden waste recycling. In 2019/20, 30 tonnes of garden waste was contaminated by asbestos with the requirement to dispose at specialist landfill sites.
- Implemented trials to improve recycling participation and quality in blocks of flats, while building relationships with Bristol Council, Swansea Council and WRAP Cymru to collaboratively develop further improvements.
- Engaged with 3326 residents through community engagement activity- including 845 school children- through the Really Rubbish Campaign between June 2021 and June 2022,.
- Ran mobile recycling facilities throughout the City,

### 3.4 Challenges

Whilst the above measures have been introduced, there has not been a significant improvement in Cardiff's recycling performance since 2016/17. This is partly due to Covid delaying the progress and visibility of some of these changes, and partly due to the fact that increasing performance is inhibited by a number of challenges.

In section 5, the strategy outlines how we will improve performance through a myriad of actions, but first it is important to contextualise the plan of action by outlining the challenges faced by an urban authority. These can be categorised into 4 key areas:

- Flats and Houses of Multiple Occupancy (HMO's)
- Socio-demographic variables
- Trade and events
- Housing and population growth

#### Flats and HMOs

Approximately 30% of the total number of properties in Cardiff are flats, normally serviced by communal bin arrangements. Improving the quality and quantity of recycling from flats is recognised nationally as a challenge with no identified blueprint to resolve this issue.

In addition, Cardiff also has a high volume of registered Houses of Multiple Occupancy (HMOs) serviced by the kerbside collection scheme. HMOs present a unique set of challenges for local communities and the Local Authorities. In areas with a greater number of HMOs such as those areas near University campuses, the density of the local population is higher, and, therefore, the demand for services like waste and recycling is greater. HMO households are also frequently associated with lower recycling levels and excess waste and present specific challenges in engaging with residents

The scale of the challenge is underscored by fact that there are 50,000 flats in Cardiff. This is higher than the entire housing stock of authorities such as Anglesey, Denbighshire, Ceredigion, Merthyr, Blaenau Gwent, Torfaen and Monmouth (StatsWales 2019 data).

Of these flats, 42,000 are in blocks of 4 or more, with communal collection arrangements. The high proportion of flats and HMOs creates very specific issues. People who live in flats recycle much less than those who live in houses, though there is a lack of substantive evidence about exactly why this is, or how it might be improved<sup>1</sup>.

The fact that 30% of the housing stock is comprised of flats may contribute towards Cardiff's disproportionately high recycling reject rate. At present, 8% of dried mixed recycling (DMR) is rejected in Cardiff, compared with a Wales average of 2%. The Council is committed to working with WRAP Cymru to undertake further analysis of the composition of recyclables collected from flats, to scrutinise this assumption. It is acknowledged that although 30% of Cardiff's housing stock is flats, the waste collected from flats does not contribute 30% of total arisings, due to the reduced occupancy level per dwelling. Nevertheless, this is a key area of challenge.

### Socio-Demographic Variables

The levels of poverty in parts of Cardiff are high in comparison to other authorities in Wales. If the Southern Arc of Cardiff (comprised of the electoral divisions of Adamsdown, Butetown, Caerau, Canton, Ely, Grangetown, Llanrumney, Riverside, Rumney, Splott, Trowbridge) was considered a single local authority, with a population of 170,000, it would be by far and away the most deprived local authority in Wales. Many of these wards are also multi-cultural with high levels of transient population. As noted in the recent House of Commons Briefing Paper - Household Waste Recycling<sup>2</sup>, housing mix and multi-occupation are an identified barrier to recycling rates across Britain. As the report notes *"Recycling rates are falling in areas where there is an increase in multi-occupancy dwellings. Rates also tend to be lower where there are challenges with social deprivation, urban classifications, education, language and residential stability."* All of these factors are prevalent in the Southern Arc of Cardiff and affect levels of participation in recycling.

There are also approximately 70,000 students registered to study at Cardiff Universities, resulting in a large student population within the city. The high academic calibre of the region's Universities combined with Cardiff's many amenities, affordability and friendliness makes the city an attractive place for students to live. As a result, the student population is projected to grow significantly over the next five years, and investment in education and engagement will need to grow to meet the increased demand.

For many students, this will be the first time they have lived away from their family home and are navigating the new responsibilities that come with independence. Second and third year students and post-graduates often choose to reside in private housing within the community

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<sup>1</sup> Making Recycling work in Flats - Resource London.

<sup>2</sup> [Household recycling in the UK - House of Commons Library \(parliament.uk\)](#)

The Council, the Universities, the Student Unions and the third sector work in partnership to provide education and engagements programmes and targeted interventions to address these issues on an annual basis as new students move into the community.

### Trade Waste

Cardiff Council offers a trade waste collection service, which has been built on providing a reliable and responsible service to Cardiff's businesses. It has a loyal customer base, with a consistent number of around 3,000 customers, representing around 30% of businesses within the city.

The provision of trade waste collections is not a statutory requirement, and it is therefore a variable factor in achieving recycling targets across local authorities. Trade waste makes up over 9% of Cardiff's total waste collected, in comparison to the Wales average of just under 4%.

A high level analysis suggests the entire removal of this service would see an immediate improvement in Cardiff's recycling rate of 3.7% (WRAP High Level Analysis of WasteDataFlow). However, Cardiff Council does not consider eliminating trade waste to help achieve the statutory recycling target as an appropriate or sustainable intervention. On the contrary, Cardiff recognises the high potential recycling gain available within the city's trade waste stream, and has identified a list of short and long term actions to grow this potential. The Council also recognises the need for the Council to lead by example, to engender a significant improvement in recycling right across the private trade waste collection sector in the city.

The Council is working with partners to complete a full trade review to understand the opportunities to improve recycling in this area. At present trade is recycling around 42% of waste collected, thus impacting upon the city's overall recycling performance. However, it is clear, there is scope to significantly improve this figure in line with the emerging Non-Domestic Waste Regulations, and in doing so increase the overall recycling performance of the city by at least 3%.

### Housing and Population Growth

Cardiff's population has increased steadily over the past 30 years (by about 2,400 people per year) but much more rapidly since 2001 (by about 3,500 per year). The 2021 census recorded a population of 362,400.

Welsh Government projections indicate that the number of households in Cardiff will increase by 37% between 2008 and 2026 from 136,741 to 187,302 households. According to the Welsh Government projections, this is driven partly by in-migration (particularly net international migration), partly by natural population increase (more births and fewer deaths), and partly by a decline in average household size with over three quarters of the growth being for 1 and 2 person households. (Cardiff's Local Development Plan 2006-2026).

It is important to note that Cardiff's Local Development Plan (LDP) is currently being reviewed, with a view to preparing a replacement LDP to cover the period 2021-26. Various elements of the original evidence base will need to be updated, to take account of issues such as land availability and policy and contextual changes since the adoption of the former plan. For the time being, the projections available in the current adopted LDP have been used to provide some context to the challenge.

**Table 4:** Population growth projected over the course of this strategy

Year	LDP Population	% increase	LDP Households	% increase
2020	381023		164126	
2021	384679	0.9%	166413	1.3%
2022	388329	0.9%	168700	1.3%
2023	392024	0.9%	170987	1.3%
2024	395795	0.9%	173274	1.3%
2025	399666	0.9%	175561	1.3%
2026	403684	1%	177845	1.3%

Source: LDP Edge Scenario C

This growth will inevitably lead to increases in the levels of waste required to be collected. The Council will need to ensure, through the relevant planning processes, that adequate external storage is provided for the separation of waste materials, with additional consideration for future proofing should collection services change. In addition, the impacts on collection round sizes, additional vehicles and staffing will need to be considered.

## 4. Delivering the Aims & Objectives of the Strategy

### 4.1 Improve Material Quality

#### Action Plan for Dry Recycling

Cardiff Council has been supported through the Welsh Government Collaborative Change Programme (CCP) to investigate the impact of various recycling and waste collection options, in terms of both cost and performance. We will expand this work further to review the carbon impacts of each option. In addition, the CCP has provided ongoing support in relation to high-level analysis of the data reported within waste data flow, alongside a full trade waste and material processing review. These pieces of work have provided the Council with long-term service change options and also identified areas of improvement that can be made in the short to mid-term.

As illustrated by Table 5, the outcome from the approach to kerbside modelling showed a limited uplift to recycling and recovery rates and the need for a range of further interventions if Cardiff is to meet statutory recycling targets. The Council is clear, however, that the current recycling collection service cannot remain as is, as material quality needs to be significantly improved.

**Table 5: Summary of Modelling Results**

Options	Option Details	Performance change compared to Baseline* – (% MSW Recovered)	Option cost – Compared to Baseline cost (£000)
Option 1	Kerbside sort with food on same vehicle	1.60%	-£1,373
Option 2	Kerbside sort (paper/card mixed) with food separate	1.60%	-£666
Option 3	Separate glass (caddy), separate fibres and containers in reusable sacks on a One Pass vehicle	1.40%	-£113

Notes relating to Table 5:

- 'Baseline cost' – is what the service cost at the time of the modelling i.e. the 'business as usual cost'.
- Option cost' refers to the difference between the baseline or business as usual cost and the proposed option cost.
- 'As is'- material from kerbside collected as identified in section 2.1, collected via our standard Refuse Collection Vehicles
- 'Kerbside sort'- separate containers for glass, paper, cardboard, plastic bottles, tubs, trays and tins/cans. Collected on a kerbside sort vehicle with multiple stillages. Material is bulked and reprocessed with limited need for sorting of material
- 'Fibres'- paper and cardboard
- 'Packaging'- metal tins/cans, plastic tubs, bottles and trays
- One pass- a refuse collection vehicle, with a 70%/30% split at the rear to keep 2 materials separate, and a pod for glass at the front

WRAPs High Level Analysis of the *Waste DataFlow* document indicates that, currently, just over 30% of MRF inputs are rejected, with 18% being non-target material, and 12% lost as part of the processing.

Co-mingled (mixed) reject makes up 8% of the total non-recyclable (residual) waste arisings, which is 6% higher than the Welsh average. To put this into context, based on 2019/20, approximately 10,000 tonnes of material were lost to reject. Assuming that 60% of this material could have been recycled, if it had been segregated correctly, an additional 6,000 tonnes of material would have been gained. Given that an additional c2000t of recycling equates to approximately 1% increase in performance, without contamination an additional 3% could potentially be achieved towards the overall recycling performance.

Whilst the above is a crude calculation, it is still clear that there is much to be gained by changing the way in which recycling is currently collected and processed. There is therefore a need to move towards segregation of materials collected in order to improve material quality and secure end market destinations for the recyclables collected. Further to this, Beyond Recycling highlights the need for high quality material to feed reprocessing and remanufacture within Wales.

The CCP modelling further suggests that by introducing reusable containers - as well as separate material streams - contamination significantly reduces. There are a number of assumptions as to why this would be. Providing a container that needs to be returned to a property is likely to reduce the temptation of placing 'unclean' material into the container, such as nappies and food waste. The Council's current recycling collection allows an 'out of sight, out of mind' culture, where bags are removed from the kerbside.

Furthermore, segregating materials and providing open containers will make it easier for collection crews to identify and reject any incorrect materials. The current single stream services - food waste and glass bottles and jars - report extremely low contamination rates, demonstrating the benefits of reusable containers and segregated material collections.

There is, currently, a separate recycling collection pilot running, within 4 areas of the City. Residents in these areas are using a reusable sack for containers, a reusable sack for packaging and a caddy for glass. Initial results have been extremely promising, with contamination levels in the region of just 5% and material quality significantly improved.

A range of vehicles have been trialled in these pilot areas, which has provided key data on a range of improvements that need to be made. During the Autumn 2022, we will have a multi stream collection vehicle in these areas, which will be capable of collecting 4/5 recycling materials at a time. At this stage, we will be able to expand the pilot further into the City, building on lessons learnt from the first phase of the pilot.

Based on the results of this trial - and further modelling in partnership with WRAP and the WLGA - Cardiff will produce a business case for a new improved recycling collection to be delivered across the City over the coming years.

Whilst the model is not yet finalised, it will meet the aims of the strategy to improve material quality, increase participation and reduce single use plastic sacks, which are not a sustainable option. It will also take into account public consultation and the growing appetite for more sustainable services. Public consultation was undertaken in Spring 2022 and received 3,305 responses. 85% of respondents agreed that there is a need to improve material quality. The majority were in favour of either a 3 stream or kerbside sort model (48.8% and 19.2% respectively), but 32% said that different options should be considered for different parts of the City. Full results can be found in Appendix 7.

Whatever the agreed future design model, it will need to provide sufficient material feedstock to develop a circular economy within Wales. Improved material quality is essential to achieving

this objective, and it is evidenced that optimum material quality is achieved through increased segregation of waste. In addition, the service will need to be sufficiently future proofed, to allow for the collection of additional materials in the future, as packaging changes and recycling markets update.

We acknowledge that change will result in uncertainty for a period of time. By recruiting extra front-line staff, we will be able to strengthen education and enforcement activity, which will be key to delivering these strategic changes and supporting communities through them.

### Action Plan for Compostable Garden Waste

Between 2017/18 and 2019/20, an average of 700 tonnes of garden waste was rejected each year. Where loads are rejected, it has a negative impact on recycling performance, and also on costs of service. In 2019/20, contaminated garden waste cost the authority an estimated £140,165.

Furthermore, whilst 90% of the materials rejected could have been good quality garden waste, where just a few residents contaminate their bin with non-recyclable items, ultimately they jeopardise all the materials collected by that vehicle on that day.

As garden waste collections became more regular following the Covid 19 pandemic, an extensive education programme took place to advise residents what can and cannot go into the green wheeled bin (or garden waste sack in bag areas). The programme was successful, with loads that have been historically rejected from certain areas accepted. The programme was successful in part due to the constant presence of the team in target areas, alongside the delivery of a letter to each property reminding them of the correct items to place into the bin. However, it is resource and cost intensive and is unlikely to be sustained for the long term.

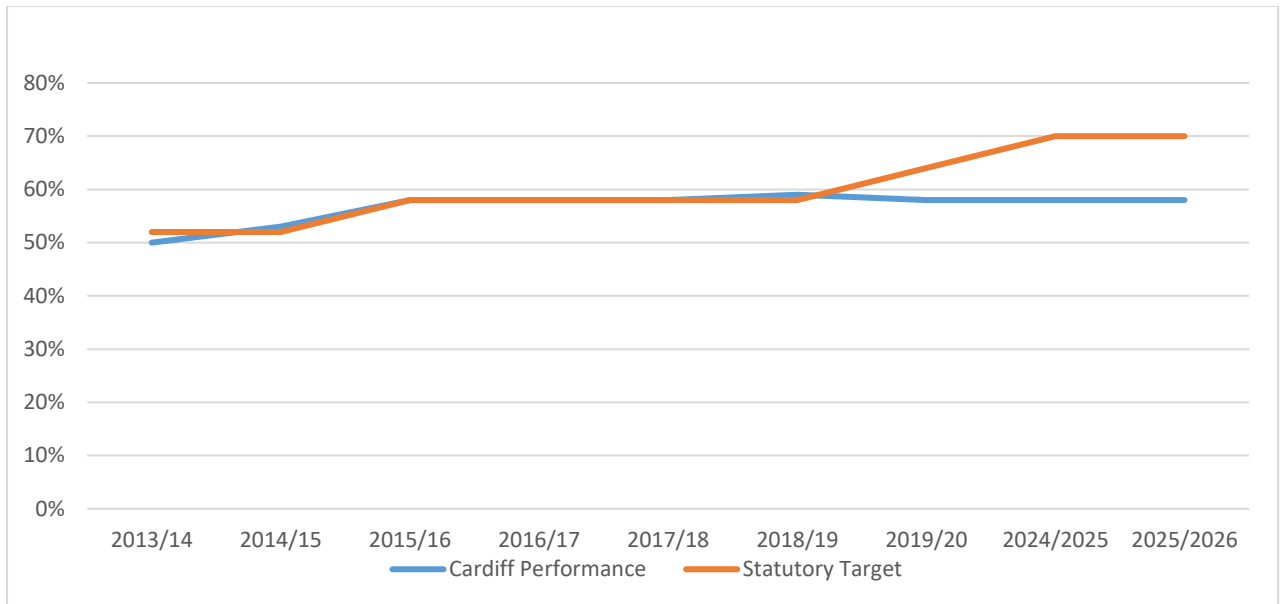
Contamination remains a problem, particularly where residents hide non-target materials underneath garden waste, as the crews are then unable to identify the contamination. Often, crews do not see the contamination until the bin is tipped into the back of the vehicle, by which time it is too late.

The current collection methodology allows 'hidden' contamination to take place. As such, the Council intends to undertake a full service review of compostable garden waste collections. This will include benchmarking with other Local Authorities, analysing contamination rates associated with alternative collection methods to identify whether infrastructural changes would help to reduce contamination.

## 4.2 Increase Recycling Participation and Capture

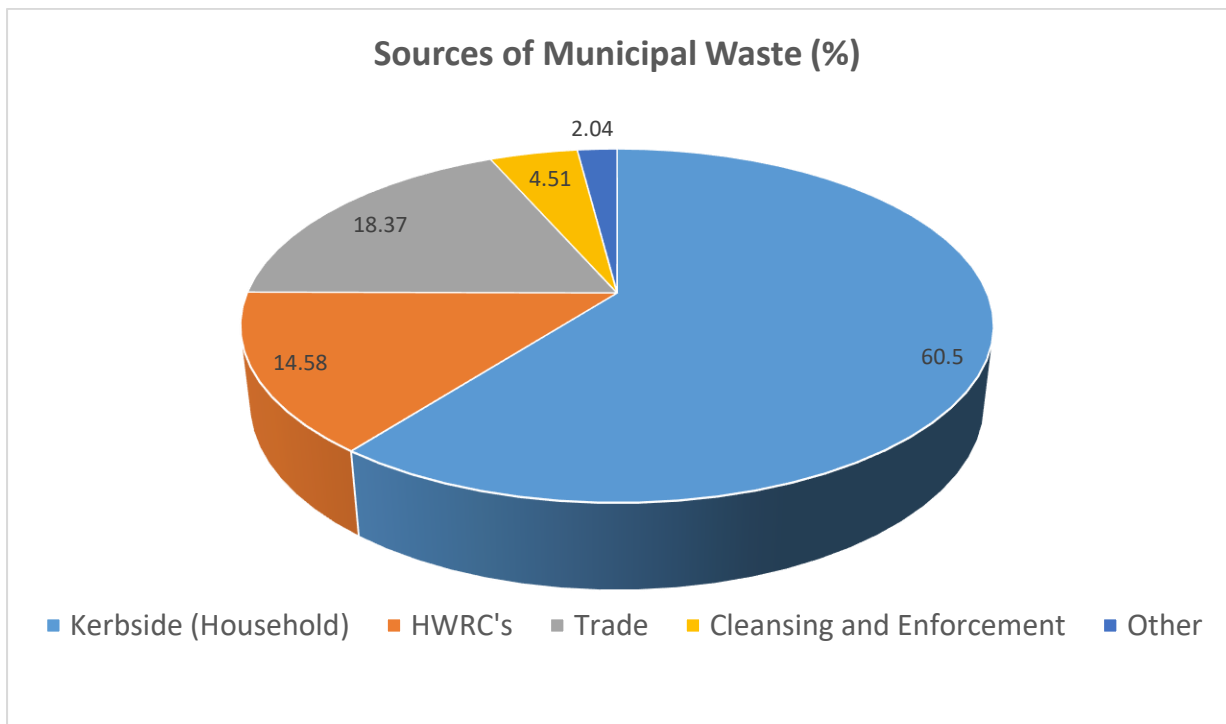
Cardiff's Local Authority Recycling Target (LART) performance for 2020/21 was circa 58%. Although unverified, performance remained at 58% for 2021/22. The graph below illustrates that performance has remained relatively stable since 2016/17, with the stepped performance increase up to 64% not having been achieved.

**Figure 3: Cardiff Recycling Performance 2016/17 – 2020/21**



In order to build on the current recycling performance, it is important to identify the sources of waste collected throughout the city. This enables focus to be placed on key areas of opportunity.

**Figure 4: Cardiff Municipal Waste Composition (%)**





## Household Waste

As Figure 4 above illustrates, kerbside household collections represents the highest proportion of waste collected. Opportunities to improve in this area include:

- improving the quality of the material collected.
- encouraging regular public participation in all available kerbside recycling schemes, and with food waste in particular).
- targeting and capturing, key priority materials for collection.

After reject, Cardiff collects 100kg/hh/yr of food waste, ranking 11<sup>th</sup> in Wales. The Wales total is 97kg/hh/yr. There is potential for improvement, with the highest performing Welsh authority collecting 129kg/hh/yr. If Cardiff were able to achieve 129kg/hh/yr it would add another 2.1 percentage points to the municipal recycling rate.

As well as improving the performance of recycling collections, a review of Cardiff's residual waste collections will also be undertaken. This will consider whether the provision of a fortnightly service, of 140L per household capacity, is appropriate in terms of balancing the specific urban challenges faced by a capital city with the need to achieve improved recycling performance. In particular the Council needs to encourage more food waste to be removed from the residual waste and put into the food recycling caddy.

Modelling has been undertaken on all of the options outlined in Table 5. Less frequent residual waste collections result in a significant increase in the recycling rate uplift ranging from 3.5-3.7%. The Council will now carry out further analysis to consider what capacity is needed and which waste streams and areas to target.

The number of flats throughout the city is a real challenge in terms of recycling performance. Flats have not been included within the modelling outlined, however, it is clearly an area of potential to be explored, yet one where little data and guidance exists. A composition analysis of waste from flats has been started, and this will be used to help inform a number of trials in flats. The trials will explore how different collection methods and educational initiatives can increase the quality (and quantity) of materials collected for recycling. In addition, a toolkit for property management companies will be developed, to work in partnership to improve recycling facilities at targeted blocks of flats. This toolkit will include a review of current bin provision, bin store design and layout, and signage and communication tools.

## Trade Waste

Trade waste collections offer a significant opportunity to improve current recycling performance. At present, it is estimated that 40% of material collected is recycled. If the Council's trade waste service was to simply reduce its residual arisings by 50%, it would deliver a 1.8% increase in overall recycling performance. However, if the Council is able to divert priority recyclable material (estimated at 60%) from the residual waste, and into the recycling streams, it could lead to a potential performance increase of 4.2%.<sup>3</sup>

Working with partners, a full trade review will be undertaken to identify potential improvements and to ensure compliance with the Non-Domestic Waste Regulations which are due to be implemented by the Welsh Government over the coming years. The Business Waste Regulations require waste producers, and collectors of waste to separate key priority materials for recycling.

As a contracted trade collector for over 3000 businesses throughout the city, the Council will support the implementation of the Non Domestic Waste Regulations. In the interim, and in lieu of the regulations being in place, a trial of separate collection of 3 waste streams from

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<sup>3</sup> *High level analysis of WasteDataFlow Returns- WRAP Cymru*

businesses will be undertaken, in readiness for a change across the whole city. In addition, all customers who are currently contracted for a residual waste collection only will be contacted to encourage recycling and where these discussions aren't successful, consideration will be given to suspension of the contract. As part of this, work will be undertaken to address incorrect presentation of material, through increased targeted intervention with customers. This will include a review of processing methods currently used, to ensure as much recycling as possible is being captured. For example, the thorough post sort of material collected from within contracted, mixed skips alongside the removal of mixed skips on 'ad hoc' occasions. Instead customers will be offered the option of providing a skip for a single material stream.

Some work has already begun to progress these actions. Following the return of customers after lockdown, contracts were renewed for customers who were encouraged to implement source separation for recycling. Customers have also been offered separate services for food waste, glass, paper, card, metal and plastic. For customers with residual only contracts, this was a mandatory requirement in order for collections to restart.

Between April and Dec 2021, the number of customers with glass collections has increased by 245%, food by 25% and recycling collections by 10%.

Since July 2021, Trade Waste have ceased to provide mixed waste skips to any one-off customers. The team are now requesting customers to organise separate skips for different waste streams (such as rubble, soil, garden waste etc) which can be diverted to a recycling facility. Since this change the Trade Waste skip service has provided 150 single waste stream skips to one-off customers (from July 2021 to Jan 2022), all of which have been diverted to be recycled.

## Schools

91% of respondents to the recycling waste strategy consultation, believed that it was important tap into the enthusiasm of young people, to make long term changes.

The Really Rubbish Campaign will be relaunched to encourage recycling and composting in schools. Linking with the Love Where You Live Campaign and Trade Services, the Waste Strategy Team will offer comprehensive support to Schools. This will include school talks, online resources and provision of support for community growing schemes. The campaign has engaged with 845 children since being invited to return to schools, following the Covid 19 pandemic.

Alongside school workshops, the campaign will also link with partnership projects via Child Friendly Cities.

## Household Waste Recycling Centres (HWRC's)

The city's Household Waste Recycling Centres are already performing at levels in excess of 80%. To maintain this high level of performance, the current booking system will be retained.

The Council has completed a full signage, and appearance review, based on recommendations from the *WRAP Cymru Assessment Report of 2021* which identified that 'signage which is easily readable and readily understood encourages site users to recycle with confidence'. To further extend this, digital signage has also been introduced at HWRCs, which are being used to feedback on recycling performance, and can be used dynamically to respond to any issues on site, resident's feedback etc.

Whilst work to identify and appropriate HWRC site in the North of Cardiff is ongoing, no suitable locations have yet to be identified, and the provision at existing sites in Cardiff currently exceeds demand.

The Council continues to run mobile recycling centres across local communities. The site at Ty Glas, whilst not a permanent solution, initially proved popular with over 500 visitors. This demand, however, reduced over time to just 184 visits per event. Whilst the site has generated 135t of recycling, analysis identifies that this is material diverted from the existing sites rather than additional material. Nevertheless, the initial demand for this service suggests that there are benefits to running pop up sites within the Community and opportunities for future events and locations are being explored. In particular, opportunities are being explored for sites that allow safe pedestrian access.

The recycling and waste strategy consultation also identified that 77% of respondents use a Household Recycling Centre. 91% felt that the number of slots available per year was sufficient for their needs and 52% would like to see increased opportunities to donate items rather than recycle.

### Other Waste

As 2025 approaches, all contributions to the city's overall waste arisings will need to be interrogated, no matter how small. To support this, further recycling segregation will be introduced, through the Council's cleansing and enforcement teams, including provision of single stream recycling litter bins, exploring the potential of increased split caged vehicles and ensuring fly-tipped waste is segregated wherever possible.

## 4.3 Increase Opportunities for Communities & Residents to Recycle

In order to increase recycling performance, recycling needs to be as easy and accessible as possible. WRAP's National Recycling Tracker survey 2020 identified that 15% of respondents believed that local council's do not collect enough things for recycling. This was mirrored in the results of the recycling and waste strategy consultation, which identified that 77% of respondents would like to see additional materials collected from the kerbside, whilst 82% would like to be able to recycle items in their local community.

In response the Council will seek to expand the range of, and opportunities to, recycle additional material. Current examples include work with Podback to explore the viability of kerbside coffee pod collections; and the recent diversion of Absorbent Hygiene Product (AHP) waste for recycling at a specialist plant. New facilities have also been introduced to make it easier *'to do the right thing'* in relation to the recycling of items such as small electrical items, textiles, batteries, and tetra paks.

At present there are a number of barriers to recycling such items. Firstly, during 2020/21 there has been a significant increase in demand for bulky waste collections. This has resulted in long lead times for collections and necessitated a review of the items collected. A policy decision was made to remove the collection of smaller items from the bulky waste collection service to reduce demand on the service and reduce lead times for the collection of larger bulky items that present storage issues at home. Secondly, control measures, such as the booking system introduced at HWRC's as a result of COVID-19 will be reviewed. Whilst there are ample slots available, the booking system may deter use of the site, as there is an annual visit limit of 26 visits per year. Thirdly, bicycles are not currently allowed to access the recycling centres. This is standard practice across the industry, however, there is appetite to enable sustainable travel while recycling.

As a first step towards addressing the above, the Council has implemented a pilot of 4 community recycling zones, with over ½ tonne of material collected over a period of only a few months. Following the success of this pilot, we are looking to expand these recycling zones across the City Hubs. These locations will be on accessible public transport and cycling routes where possible, and integrated within communities so that walking to recycle may even be possible.

The city's two Household Waste Recycling Centres currently have sufficient capacity to meet the current need. However, given the predicted levels of growth in population in the city in Cardiff's Local Development Plan, the Council will continue to review the need for an additional Household Recycling Centre.

The Council will also explore the possibility of pop-up recycling/repair centres, to facilitate the reuse, repair and recycling of items such as small domestic appliances, which can be hard to dispose of, and are very damaging to the environment.

#### 4.4 Make Use of all Available Data to Develop Targeted Actions

Cardiff has set out its vision to be a 'Smart City'. This involves using data to improve decision making, provide better services and promote innovation. This approach will also be adopted across the Council waste and recycling services.

Work will be undertaken to identify new sources of data, within the recycling services operation, that can be utilised in line with the open data strategy. This includes areas such as education and enforcement action statistics, as well as promoting the open data available in relation to recycling and material destinations, including *Stats Wales* and information published from waste data flow at [www.myrecyclingwales.org.uk](http://www.myrecyclingwales.org.uk). This will provide confidence in the transparency of the recycling process, which is identified as an action within the 'Building on our recycling record' core theme within the Beyond Recycling Welsh Government strategy.

In order to increase participation and capture, it is important to understand what is currently being collected. For this reason, the Council has worked with WRAP Cymru to undertake a programme of compositional analysis of kerbside collected, and flats collected, residual and recycling waste. The results show current capture rates of priority materials, and provide clear evidence for areas of focus. For example, despite providing free weekly collections of food waste, there remains a surprisingly high volume of food waste in the residual waste stream for both flats and households (see Section 4.3 and Appendix 6).

In addition, dashboard data from tools such as Power BI will be utilised to clearly map out further areas of focus. The data dashboard will be linked to the integrated collections software, to drill down into issues such as contamination.

Regular participation monitoring will also be undertaken throughout the city, in line with WLGAs Capturing Recycling- A guide to behavioural change strategy. The participation monitoring exercises will identify residents not taking part in recycling services, with appropriate interventions taking place with an education focus, moving into enforcement for continued non-participation without reasonable explanation.

The Council will continue to work closely with WRAP to support and promote the national 'Be Mighty Recycle' Campaign. In addition to the promotional materials, the campaign offers the opportunity to share data and identify best practice methodologies, as well as helping to identify target demographics.

Existing technologies will also be utilised to help the Council work smarter. In-cab devices are already utilised to log contaminated bins and bags. This data in turn is used to help target residents with letters advising them of which items need to go into which container. Where residents continue to present incorrect items, there is follow up with further education and ultimately enforcement (see Appendix 2 - The Pink Sticker Campaign).

The Council will continue to collaborate with other local authorities for recycling contracts of materials such as WEEE and textiles, whilst ensuring what is collected 'works harder' and provides the maximum recovery rates. Disposal/recycling contracts will be regularly reviewed

to ensure minimum recovery rates are being met (where stipulated) and benchmarking of neighbouring local authorities to identify if improved opportunities are available.

## 4.5 Reduce Single Use Plastics (SUPs)

The removal of single use plastics is a topical issue. In March 2019, the EU Parliament approved a new law banning single-use plastic items such as plates, cutlery, straws and cotton bud sticks. A ban on supplying plastic straws, stirrers and plastic-stemmed cotton buds came into force in England on Thursday 1 October 2020.

Welsh Government undertook a consultation on the ban of single use plastics between July and October 2020. If the proposals are implemented in Wales, a range of single use, hard to recycle and commonly littered plastic items, such as straws, cotton buds, polystyrene food and drinks containers would be banned, subject to any exemptions.

The One Planet Cardiff Strategy proposes a wide range of ambitious actions that will begin to form the basis of a delivery plan to achieve Carbon Neutrality. Within this, there is a commitment to reduce the Council's use of Single Use Plastics, and the Council is committed to developing and implementing an action plan for Single Use Plastics. The action plan for Cardiff will focus on the following:

1. Identifying all Single Use Plastics Purchased: This will involve a review of procurement processes with a view to avoid SUP's (unless there is a clear medical or other legitimate requirement) and understand the carbon impacts on the procurement process. This will include reviewing the provision of plastic sacks for Dried Mixed Recycling (DMR) and non recyclable waste. In 2021/22, 27 million single use plastic sacks were provided.
2. Promoting Reuse, Recycling of Plastics: Through both internal and external communications, the Council will encourage the recycling of plastic bottles as well as the reuse and prevention of single use plastics by promoting sustainable alternatives. This could include reusable coffee cups and water bottles, as well as other reusable item (carrier bags, straws etc). The national deposit return scheme agenda will be supported by responding in favour to consultations, as well as reviewing the opportunity for 'reverse vending' within our communities.
3. Promoting Refill: Cardiff is already working with Refill to support the concept of refill stations. Participating businesses display 'refill' stickers in their windows to let people know they offer free tap water and that there is no need to feel uncomfortable or embarrassed asking for it. Participating organisations also appear on the [Refill app](#), making the nearest Refill point easy to locate. Those who sign up to the app can refill their water bottles for free, and also earn points each time they refill to get a free gift to help towards a more 'refillable life'. There are currently over 10,000 Refill Stations across the UK. All of the Council's libraries/hubs have now registered with Refill and several of the high-street coffee shop chains are also registered with them. Where the water utility infrastructure is compatible the Council will seek funding with a view to installing refill stations in the city's hubs. We will also look to expand re-fill into the public realm, for example in parks, the City Centre and district shopping hubs.
4. Working with Partners: The Council has already undertaken a partnership arrangement with Keep Wales Tidy and Terracycle to remove, collect and recycle plastics from our waterways and bay area. The Council will commit to support, work with and promote like-minded campaigns to reduce the negative impacts of single use plastics. The Government's initiative to ban single use disposable cups from stadiums will be supported, and the idea of a re-useable 'Cardiff' cup in Cardiff's stadia will also be taken forward. Work will also take place with partners to identify regional solutions and to help support a circular economy in Wales.

5. Difficult Materials: The opportunity to recycle difficult materials such as car tyres, single use coffee cups; polystyrene mattresses etc will continue to be explored. The recycling of car tyres, carpets, UPVC window frames, hard plastics and mattresses is already in place at the Household Waste Recycling Centres. A polystyrene recycling trial has been undertaken, but due to the volume to weight ratio of the material, a viable recycling collection method is currently not available in the market place. Nonetheless, this opportunity will be kept under review. Options for coffee-pod recycling in partnership with Podback are currently being explored, as well as working with partners to recycle AHP (Absorbent Hygiene Products such as nappies).

## 4.6 Encourage the Prevention, Reuse and Repair of Materials

We will develop digital and smart solutions to improve resource efficiency by investigating the possibility of a 're-use' network within our buildings. The intention will be to encourage the re-use of office furniture and equipment. In addition, the Council is partners of Resource Efficiency Wales' repair network, to signpost residents to repair options.

The Beyond Recycling strategy states *'In order to move to a circular, low carbon economy we will need to reduce the amount of waste produced by households, businesses and the public sector so that unnecessary waste is prevented, products are re-used and repair and remanufacturing are a core part of our society'*

Through blanket communication campaigns and targeted outreach events the Council will provide advice to residents on what they can do to reduce waste in their homes. For example, utilising national campaign materials such as Love Food Hate Waste to promote the reduction of food waste. The re-use shop at Lamby Way Household Recycling Centre has also recently been launched to encourage residents to pass on items that still have life in them.

In addition to promoting waste reduction, reuse will be supported. The benefits of providing a real nappy incentive to residents will be investigated, utilising knowledge from other local authorities to develop a Cardiff real nappy scheme.

The partnership with Benthyc Cymru & Repair Café Wales will be continued to deliver mobile events across the city and remove any barriers to borrowing by providing home deliveries. In addition, opportunities to include new repair/re-use facilities within community regeneration schemes will be explored. Initiatives such as community fridges, food redistribution and community composting delivered through partnership with Llanrumney Hall and Green Squirrel will continue to be supported. Re-fill Cardiff will also be supported to expand their scheme across Cardiff, and to develop a digital 'zero waste' map to identify areas where residents can access re-fill, community borrowing, repair café and food redistribution opportunities across the city.

The Council also awaits the introduction of emerging legislation, such as Extended Producer Responsibility and Deposit Return Scheme. Whilst deposit return scheme will aid in encouraging users to recycle an item, it may bring about circular change in terms of encouraging re-use & refill of containers, for those who may not wish to pay a deposit on packaging material.

Extended producer responsibility will incentivise the design of packaging to making it easier to recycle. This is anticipated to further reduce the amount of 'hard to recycle' material currently within our waste streams.

## 4.7 Contribute Towards Developing a Circular Economy within Wales

Although Cardiff recognises the importance of increasing its recycling rates to meet statutory targets, it is important not lose sight of the wider national objective of One Planet, Zero Waste Wales by 2050.

Increasing participation and capturing priority material supports this objective. However, Cardiff will work to support the wider vision by actively prioritising messaging and actions around waste minimisation, re-use and repair, through businesses, residents and corporately through the Council own internal operations.

Much of the Council's corporate vision in this regard is outlined in the One Planet Cardiff Strategy. The actions outlined within section 5 are intrinsically linked to the majority of the 6 core themes set out in the Beyond Recycling strategy. There are a number of further actions the Council will take, such as continuing the partnership with other local authorities in the Anaerobic Digestion and Energy Recovery facilities, as well as the development of a solar panel farm at Lamby Way.

As stated in Beyond Recycling '*The Government cannot bring about the transition to a circular economy alone.*' It is understood that individual actions play a big part in this transition and the Council will work to empower everyone to make changes that suits them, appreciating the benefit that small changes can make.

The role of our community development co-ordinator will be expanded in line with the Caru Cymru initiative, to become involved with waste reduction, re-use and repair. This will enable the prevention of issues associated with poor Local Environmental Quality, including littering and fly-tipping.

The Council will work with young people to develop the waste strategy and tap into their enthusiasm. The existing 'Really Rubbish' campaign will be re-invigorated, and re-branded, to promote circular economy within schools. Work will continue with the Council's child friendly city teams in making young person's ideas a reality, through initiatives such as the expansion of Terracycle points throughout the city and the community mural at the Recycling Centre designed by children.

The Council will prioritise re-used materials in public sector purchases, by investigating the ability of setting up a re-use network within our buildings. The Council will also support all elements in the delivery of the litter prevention, and fly-tipping strategies, being a key partner of Caru Cymru and driving through community cohesion and behavioural change.

## 4.8 Action Plan and Key Dates

The three main actions anticipated to deliver the maximum increase in recycling performance are:

1. Improving the recycling performance of the Council's Trade waste service.
2. Expanding the residential recycling service to include new segregation streams.
3. Diverting recyclable materials from the residual waste stream.

As the above will involve significant changes, they are unlikely to be fully implemented until 2024-25. However, several steps will be taken before this date to incrementally increase Cardiff's recycling performance, and to lay the foundations for the planned changes. The changes will be made on a phased approach, based on local knowledge and data.

For example, in Quarter 3 2022, we will expand the separated recycling collection scheme into further areas. The expansion will involve the provision reusable sacks for the collection

of segregated recyclables, as well as a bespoke multi stream collection vehicle, where all material can be collected on the same collection vehicle. The detail from the expanded collection will help to inform the business case for city wide roll out of segregated recycling collections in 2024-25. Alongside the trial, we will continue to expand recycling services through the promotion of our AHP service, introduction of coffee pod, battery and small electrical item recycling and through the expansion of community based recycling facilities.

In relation to Trade Waste, we have already commenced the trial of segregated collections using a one-pass vehicle. Furthermore, the Trade Waste Team is working with both existing and new customers to encourage recycling over residual waste. As such, we hope to see some immediate improvements in trade waste recycling performance.

In addition to the above, several improvements have been implemented in 2021, which will help to immediately improve Cardiff's recycling performance. These include:

- Recycling of AHP waste
- Opening of a Reuse Shop at Lamby Way
- Working with Corporate Partners to ensure reuse and recycling of office furniture
- Segregation of cleansing waste to increase recycling

A summary of the main actions for implementation can be found in Appendix 5.



## 5. Working with Stakeholders to Deliver the Strategy

### 5.1 Working Together

Managing waste is not limited to the Local Authority, it is something that all residents and businesses in Cardiff contribute to, and therefore we all have a role to play in ensuring the city's waste is managed in a responsible way, for our own benefit and for that of generations to come. The city is at its best when we work together. Communication and consultation with relevant stakeholders is key, as is working with neighbouring authorities to identify best practice and regional solutions.

The recently opened Re-Use Shop at Lamby Way HWRC is a prime example of what can be achieved by working together. The shop has been introduced through working in partnership with Wastesavers to establish a convenient and environmentally friendly way to give items a new home, instead of disposal. The re-use shop will enable the resale of household items which in turn will benefit the city's recycling rate through waste minimisation. It will provide access to furniture and items for the community at low cost (with associated social benefit), and although likely modest in value, will generate income for re-investing into the service and into the community.

The Re-Use Shop at Lamby Way also provides a clear example of fulfilling the 5 ways of working, as set out in the Future Wellbeing of Generations Act, by thinking of long term prevention in terms of allowing accessibility to affordable goods, collaboration with other local authorities for benchmarking and Waste Savers for delivery.

The Council is also committed to the 'involvement' of local communities and key stakeholders when making decisions. Opportunities for feedback will be available to all throughout the duration of this strategy. The Council will continue to involve residents in the key decisions that need to be made on the journey towards 70% and a circular economy. Following on from the public consultation survey results (Appendix 7), focus groups will be held with key representatives from the community to consider how services can meet the needs of the 32% who felt that different options need to be considered for different areas.

### 5.2 Community Engagement

Working with residents and understanding the city's communities is integral to influencing better decisions, when seeking to continuously improve Council services.

The Council's Waste Management services work with a comprehensive network of passionate volunteers through the Love Where You Live Campaign. The volunteers and community groups understand the specific needs of their local community and make a considerable impact by offering advice and advocating appropriate Council services to their neighbours. The relationship with members of the community opens a dialogue with the Council, and provides an opportunity to identify need, map resource and plan future improvements.

Cardiff Council will continue to work together with community groups and volunteers to encourage residents to feel part of their community, engage with community activity and to feel empowered to help each other. In particular, the Council will seek to engage the local community in the Waste Strategy for Cardiff by:

- Working with partners and the community to facilitate the reuse and repair of items
- Providing recycling facilities at easier to reach locations for harder to recycle materials (e.g. facilities for recycling small domestic appliances at local hubs)
- Providing opportunities for community litter pickers to segregate materials for recycling

- Offering Schools a comprehensive recycling led service to further maximise recycling and to encourage recycling behaviours.
- Responding to qualitative feedback, for example through the implementation of focus groups, tracking comments on social media/neighbourhood conversations
- Working with schools and local businesses to empower them to:
  - promote behaviours that align with the waste hierarchy,
  - encourage the transfer of pro-environmental behaviours from home into the school or workplace environment

In addition, and in recognition of Cardiff citizens improving the city's recycling performance and reducing their carbon footprint, the Council will look to fund 'Love Where You Live' initiatives to improve the environment where people live; be it through community supported planters, child friendly play lanes, improvements to parks or maintaining unloved spaces. The aim is to have a City and planet loved by everyone.

### 5.3 Behavioural Change Strategies

There is an emerging shift in consumer culture and growing environmental awareness (*A Litter and Fly-Tipping Free Wales, Consultation Document WG41821*). Cardiff will need to harness this awareness, utilising the good will that is prevalent within some communities.

The Council will therefore develop communication, educational and behavioural change programmes that further enhance the measures already in place. Whilst blanket approaches have a place within the city, the Council will make use of all available data to undertake targeted campaigns, based on segmentation data identifying the most effective approach for the area.

As mentioned previously, we will link into toolkits and campaigns such as:

- WLGA's Capturing Recycling
- The Pink Sticker Campaign
- Love Food Hate Waste
- Be Mighty Recycle

The council will also make further use of hyper-localism through communications, for example 'Roath Recycles' to enhance community and locality-based benefits when it comes to sustainable waste management.

With regards to recycling, the focus will continue to be on education and behavioural change, with enforcement as a last resort. When all communication and engagement routes have been exhausted the Council will use the powers under S46 of the Environmental Protection Act 1990 to take enforcement action against residents who are not following policies for recycling. The Council will retain a zero-tolerance approach to other waste and littering offences such as fly-tipping (See Appendix 3: The Waste Education and Enforcement Strategy for further details).

To help address the challenges of changing behaviour in flats and rented accommodation, the Council will work closely with relevant partners, such as Rentsmart Wales to try to strengthen licensing conditions. In addition, the Council will work with landlord associations and letting agents to help distribute recycling messages and infrastructure to hard to reach groups.

Cardiff Council has committed to running a climate crisis behaviour change campaign and recycling will play a key part in this, due to the fact it is a meaningful area where everyone can contribute.

Each communications initiative and service change will be based on delivering value for money, and will seek to collaborate with surrounding authorities, and partners, to adopt best practice, as it exists.

## 6. Monitor, Measure and Review

### 6.1 Measure and Review

The Waste Strategy for Cardiff will be reviewed on an annual basis, to monitor progress against the action plan. Costs and progress towards waste and recycling targets will be monitored by Cabinet and the Environment Scrutiny Committee. As this is a multi-year strategy, with changes anticipated in the material markets, developments in technology and the ongoing development of Cardiff itself, the Waste Strategy will be reviewed every three years.

### 6.2 Post Service Change Review and Monitoring and Measurement

To understand the impact of any change of service, key metrics will be developed to monitor progress. This information will be captured and analysed by the waste and recycling team and reported to the relevant Cabinet Member, Cabinet and Scrutiny Committee. For each major service change, there will also be a review of service standards (see Appendix 4) to ensure the needs of customers are still being met whilst improving recycling performance.

### 6.3 Key Performance Indicators

The service has a number of Key Performance Indicators which underpin the work undertaken. These will continue to be used to monitor performance on a quarterly and annual basis. The Key Performance Indicators include:

- The percentage of municipal waste collected and prepared for re-use and/or recycled.
- The percentage of waste collected at recycling centres that has been prepared for re-use or recycled.
- The number of education and enforcement actions per month relating to improving recycling behaviour by citizens.

## Appendices

- Appendix 1: Waste Strategy Gap Analysis
- Appendix 2: The Pink Sticker Campaign
- Appendix 3: The Waste Education and Enforcement Strategy 2021
- Appendix 4: Service Standards 2021
- Appendix 5: Action Plan Summary
- Appendix 6: WRAP Compositional Analysis Report 2021

## Appendix 1 – Gap Analysis

### Waste Management Strategy 2018-21, Gap analysis

Action	Delivered	Narrative	Outstanding actions to be brought forward
Piloting a separate glass waste collection service	Yes	Pilot a fortnightly collection of glass in a separate container.	Pilot completed for 15,000 properties and business case for further roll out to be developed during 2021-25 strategy.
Expand the Provision of the Wheeled Bin Service	Yes	Expand the wheeled bin service to a further 3,000 households	Completed.
Develop new recycling infrastructure and changes to HWRCs	Yes	Develop education stations at HWRC to exceed 80% recycling.  Deliver business case to support new HWRC in the North East of the City.	Education stations delivered. No unsorted black bag policy now in place. Introduced a reuse facility at Lamby Way HWRC in Partnership with Waste Savers.  New booking system in place to better manage customer access and demand, and provide baseline statistics for business case.

Explore Options to Improve Efficiency and Customer Experience	Yes	<p>Considering the collection of recycling and waste on Bank Holidays.</p> <p>Delivering a demand led compost collection service during the winter months.</p>	<p>Completed during Q4 2021- no longer collections on a Monday.</p> <p>Monthly service remains in place, demand based service to be explored during the 2021-25 Strategy.</p> <p>New services developed on digital channels  Ordering recycling equipment  Recycling A-Z  Bulky waste collections  HWRC bookings  Missed collections</p>
Education	Yes - ongoing	<p>Provide targeted educational messages specific to areas.</p> <p>Work with partner organisations and support national campaigns. Use best practise research to deliver behaviour change campaigns.</p> <p>Continue with the 'Love Where You Live' and 'Really Rubbish' campaign.</p>	<p>Ongoing work to continue awareness raising amongst the community. Continue to fund the 'Love Where You Live', secure funding for additional support to broaden the remit of 'Love Where You Live' to include waste minimisation and reuse initiatives in the community.</p> <p>Welsh Water and Viridor providing education to community groups for their target waste streams.</p> <p>'Really Rubbish' to be re-branded and target green bag materials, and future changes to kerbside materials.</p>

Targeted Stakeholder Engagement & Communication	Yes - ongoing	<p>Continue to work in partnership with local universities and the third sector to deliver street scene and recycling improvements.</p> <p>Work with community leaders from Ethnic Communities to increase reuse and recycling.</p>	Ongoing support to the Student Liaison Officer role and support to the community through local groups, such as Environmental Champions.
Partnership working	Yes - ongoing	Explore community and charity partnerships to deliver longer term recycling and support the Welsh Circular Economy in Wales.	<p>Developed new recycling infrastructure for textiles at Hubs to facilitate community recycling.</p> <p>To be expanded further within the next strategy.</p>
New Markets for Recycled Waste	No	Explore new markets for recycling as they become viable.	<p>Absorbent Hygiene Products collected via the Hygiene service are now being recycled.</p> <p>We will continue to explore markets through the next strategy with organisations such as CLARE Wales.</p>
Single Use Plastics		<p>Reduce single use plastics by the Council and in supply chains.</p> <p>Work with partners to promote awareness of environmental damage caused by single use plastics.</p>	<p>Water Refill Stations supported through the 'Love Where You Live' campaign.</p> <p>Trial of reuse sacks to replace single use plastic sacks.</p>

		Continue to work with Welsh Water to deliver water refill stations. Continue to promote the environmental benefits of plastics recycling.	Ceased provision of red and white striped bags.
Alternative fuel mediums	Yes - ongoing	Explore alternative fuel mediums – such as electric vehicles for the HGV fleet.	A number of electric vehicles are now within the Council's fleet of vehicles, including RCV's and cleansing vehicles.
Enforcement	Yes - ongoing	Adopt 'zero tolerance' approach to environmental crime.  Update and revise environmental crime policies around fly tipping, public protection and littering.	A zero tolerance approach is in place for Enforcement.  Fixed Penalty Notices (FPNs) now in place for fly tipping (£400) and householder Duty of Care (£300).
Kerbside collection policy	Ongoing	Ensure the Council's Technically, Environmentally and Economically Practicable (TEEP) position is re-tested against the Recycling and Environment Regulations to ensure maximum cost effective recycling.	Work is ongoing with WRAP and WG to deliver the most sustainable kerbside collection for Cardiff. Since the last strategy, separate glass collections have been trailed and will be expanded.  Reducing contamination has been a priority since the last strategy with a view to increase the quality of materials collected at the kerbside. This has been developed through the 'Pink Sticker' campaign.
Domestic collections, including bulky and hygiene collections	Yes	Explore the need for re-zoning collection days.	Collection days were re-zoned during Q4 of 2021 and included: - Increased round efficiency



			<ul style="list-style-type: none"> <li>- Removal of double shift resulting in better opportunities for vehicle maintenance</li> </ul> <p>Bulky waste collections can now be booked in via the Cardiff.gov app.</p>
Bring Sites	Yes	Explore the benefits of new bring sites where demand has been identified.	<p>The need for bring sites is continually reviewed, no new sites delivered during the period.</p> <p>Facilities are being trailed at community hubs e.g textiles, look to expand further during next strategy.</p> <p>A mobile pop-up recycling centre has been trialled and has proven popular.</p>
Deposit Return Schemes	No	We will work with industry and Welsh Government to contribute to the development of schemes.	No new schemes have been developed through the period of the strategy, although Cardiff has responded in favour to the recently published consultation.
'On the move' recycling and fly-tipping	Yes	<p>Work with WG on their national behaviour change campaigns to deliver new recycling litter bins in high footfall areas.</p> <p>Explore the use of 'nudge' theory to influence people's habits.</p>	<p>Community Development Officer post created to drive the initiative.</p> <p>Funding secured for split transit vehicles to segregate recycled waste collected during litter picking.</p>

		Facilitate recycling from community litter picks. Increase support for 'Love Where You Live'.	Aperture recycling litter bins procured in areas of high footfall and being used in areas such as parks during spring/summer.
Street Sweepings	Yes-ongoing	Remove litter from collected sweepings to ensure non-target material is removed from the recycling process.	Mechanical sweepings are sent to de-watering facilities where non-target materials are removed, resulting in an end product that is recycled.
Commercial services	Ongoing	Undertake targeted recycling campaigns for SMEs, and evaluate their effectiveness to encourage other businesses to reuse and recycle as much as possible.  Expand the skip service to provide targeted material options.	Mixed skips were post-sorted with 60% recovery rate. Single stream recycling skips now provided.  Created new stand alone website with new branding to raise profile of the service.  Collections model will need to be reviewed in line with the Business Waste Regs. Trials took place in 2021, with a view to expand the service in 2022.
Waste Transfer and Secondary Sorting	No	Use secondary sorting to extract recyclables that have been disposed of incorrectly to achieve higher recycling rates.	Tender being prepared for limited amount of secondary sorting. Preferred option is separation at source in line with Circular Economy approach.
Disposal & Landfill Aftercare	Yes	Observe statutory requirements to protect and care for the Landfill site at Lamby Way and explore end of use options for the site.	Management of the closed landfill is ongoing. 42 acres of the closed landfill is now in use as a solar farm generating 8.99 MW/year.



## Appendix 2: The Pink Sticker Campaign

The Pink Sticker Campaign aims to improve the quality of recycling and composting collected from the kerbside by Cardiff Council – helping the city become one of the best recycling cities in the world. It is an education focused campaign, to let residents know they've done something wrong and to improve the quality of material. There is support available from recycling officers, to help residents understand, as well as a series of education letters being provided. Enforcement is a last step, for persistent incorrect usage despite support being provided.

Figures released by the council show that 18% of the materials presented in green bags are not actually suitable for recycling and hamper the recycling process. An additional 12% of material is lost or ruined within the process, meaning that 30% of the material presented in green bags is contaminated. The main offenders are dirty nappies, clothes, packaging and food waste.

There are kerbside collection services available for nappies and food waste, with alternative provisions available locally and at the Household Recycling Centres to recycle textiles.

Green recycling bags are for the recycling of dry, clean household packaging such as glass bottles and jars, plastic bottles/tubs/trays, tin cans and aerosols, paper such as magazines/letter paper and flat packed, small amounts of cardboard. We also need residents to rinse out their cans, tins and glass before they recycle them. It will all help to make Cardiff one of the world's best cities for recycling and that's something we can all be proud of.

Green garden waste is also being presented with incorrect materials such as watering cans, cardboard, and garden furniture. Processing contamination from green waste cost over £95,000 in 2020/21. For the garden waste, we only want grass, tree or shrub cuttings. These are the only items that should be put in the green-wheelie bins/reusable sacks.

Processing contamination from both green recycling bags, and garden waste, is costly but also negatively impacts the City's recycling performance.

The scheme involves bright pink stickers being placed on recycling bags, food caddies and garden waste bins (or sacks in bag areas) alerting residents that they contain incorrect items. If a pink sticker is put onto a container, residents will have to take their waste back into their property to remove the incorrect items before they put their recycling out again on the next collection date.

If people see pink, we want them to stop and think. We are also encouraging the message that if in doubt, leave it out. We know that residents want to recycle as much as possible, as people become more eco-conscious. This can result in residents putting items in the hope that they will be recycled. However, this desire, known as aspirational recycling or 'wish cycling' can cause problems in the recycling process, and ruin the quality of the material.

The pink stickers will point residents to a website, which gives an 'A-Z of recyclables' so they can familiarise themselves with what items should be put in the containers provided. In addition, there is also a new contact us form where residents can request advice on any additional materials they are unsure of.

The 'See Pink, Stop and think' campaign briefly consists of the following stages:

- **Pink sticker applied, to let residents know they've done something wrong. A record is also made within the collection team's in-cab device**
- **A series of education letters sent to properties, each time contamination is identified, providing information and signposting to support available.**
- **When education has been provided on a number of occasions or as part of an area/street wide campaign, a Section 46 Notice may be issued. This is a legal letter to notify how residents should present their recycling and waste for collection.**
- **Where a property is under a Section 46 Notice, and recycling and waste is presented incorrectly, a £100 Fixed Penalty Notice will be issued.**

In addition to the above processes, further education may be provided including full street letters, outreach, face to face engagement with residents through door knocking, or attendance at community events. Recycling officers are also on hand to provide advice via any means possible.

It is important to emphasise that this campaign and the stages outlined only apply to residents putting the wrong materials in their recycling and composting. For all other environmental offences, such as littering, fly tipping, flyposting, as well as others, waste enforcement will operate as usual on a zero tolerance approach.

If a resident ignores the pink sticker and leaves their waste out on the street, they could face an immediate £100 fixed penalty notice for littering.

# Street Scene Education and Enforcement Policy



**September 2022**

**Version 1.0**

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# 1 Policy, Aims and Objectives

## 1.1 Purpose of the Policy

The Neighbourhood Services team is part of the Waste Management Service, reporting to the Assistant Director for Street Scene. Within the Neighbourhood Services team, there are a range of officers trained to search and remove waste, as well as a team of officers with powers to take enforcement action for a wide range of environmental offences. This policy sets out the role of the Neighbourhood Services team within the Directorate, along with the powers adopted in order to tackle environmental crime.

The specific aims and objectives of this policy are to:

- Provide a clear overview of Neighbourhood Services Education and Enforcement.
- Outline the various offences that Neighbourhood Services Officers tackle.
- Outline the relevant legislation, policies and procedures under which the team operate.

The policy also incorporates the Regulator's Compliance Code issued by the Department of Business Enterprise and Regulatory Reform, which became effective on 6<sup>th</sup> April 2008. This Code requires local authorities to have regard to it when they take enforcement action in certain areas.<sup>1</sup>

Specific details of the relevant legislation applying to each offence can be found in Appendix 1.

## 1.2 Organisational Approach

Cardiff Council is committed to the principles laid out in the Government's Enforcement Concordat (see Appendix 2). This means the Council will support and persuade people to change their behaviour through information, education and advice, but will not hesitate to take enforcement action such as issuing Fixed Penalty Notices or prosecuting when appropriate. This will send a clear message to those individuals or businesses who continue to spoil the environment.

Most enforcement activity takes place on the public highway, but it can be undertaken anywhere where there is evidence of an offence.

The Education Enforcement Team work in accordance with the Council's standards of customer care and equality.

This means that the officers will:

- Provide information regarding the service delivered when asked;

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<sup>1</sup> This includes action under the Control of Pollution (Amendment) Act 1989, Environmental Protection Act 1990 and Clean Neighbourhoods and Environment Act 2005.



- Treat all people fairly and offer equal opportunity for service delivery regardless of their ethnic background, religion, sex, sexual orientation, age or physical ability;
- Treat people in a courteous and respectful manner and
- Promptly respond to reports of incidents and requests for service and enquiries.

In the course of undertaking enforcement activities, officers may sometimes encounter vulnerable people who have committed an offence. For example, someone who is homeless or has a mental health condition. In such circumstances a standard enforcement approach might not be appropriate or in the public interest. Therefore, each case involving a vulnerable person will be carefully assessed, in conjunction with the relevant Council service area, to establish the best course of action.

### **1.3 Associated Polices, Plans and Strategies**

The following polices guide the day-to-day management of the Street Scene Education and Enforcement Team:

- Capital Ambition
- Corporate Plan
- Recycling Waste Strategy

The Street Scene Education and Enforcement Team play an important role in the delivering some of the priorities set out in each document. These priorities include:

- Creating a cleaner city.
- Supporting residents to take greater responsibility for the cleanliness of their local communities.
- Tackling environmental crime that detrimentally affects the local environmental quality of our communities.
- Applying a zero-tolerance approach to fly-tipping and littering offences.

In order to carry out these functions, the team must use relevant legislation, whilst also adhering to good practice.

## **2 Delivering Education and Enforcement**

### **2.1 Good Practice Education and Enforcement**

The primary objective of this policy is to achieve a consistent and effective environmental quality through targeted education and enforcement action where required within Cardiff. This ensures the protection and safety of the public is maintained.

The aim is to secure efficient compliance with legislation whilst minimising the burden to the Council, individuals, organisations and businesses. It will be applied, as far as reasonably practicable and applicable to all enforcement situations, and it explains in general terms the approach adopted by the Council when carrying out the Council's education and enforcement duties.

In seeking to achieve these aims and objectives, Cardiff Council will ensure all education and enforcement activities are:

- undertaken in accordance with the principles of ‘good enforcement’ specified by the Enforcement Concordat;
- compatible with the convention rights specified by the human Rights Act 1998 to protect the rights of the individual;
- managed in an efficient manner;
- taken promptly and without unnecessary delay;
- undertaken in a fair independent and transparent manner with each case being considered on its own merits;
- not influenced by colour, ethnic origin, race, gender, disability, sexual orientation, gender re-assignment, religion, marital status, gender, age or political beliefs or by improper or undue pressure from any source;
- aligned to the Business Plan and Corporate Plan and capital ambition;
- appropriate and proportional to the problem;
- evidential and in the public interest in the Code for Crown Prosecutors
- helpful to both householders and businesses meet their obligations by providing advice and information;
- in place to take firm action against those who disregard the law; and
- complaint with the principles in the Regulations Compliance Code (for certain functions identified by the legislative and Regulatory Functions Act).

### **3 The Neighbourhood Services Education and Enforcement Team**

This section sets out the current range of activities undertaken by the Enforcement Team. Primary activities include:

- Incorrect Waste Presentation
- Recycling Education
- Waste In Frontages
- Commercial Waste
- Fly-tipping and Local Environmental Quality
- High Hedges

#### **3.1 Incorrect Waste Presentation**

The Council has a statutory duty to keep the streets of Cardiff at an acceptable level of cleanliness. Each year, all local authorities in Wales - along with Keep Wales Tidy - need to carry out street cleanliness surveys. All surveys follow the same method (LEAMS Surveys), and the data is used to calculate Wales’ Performance Indicator for

Streetscene, which is used to measure how local authorities are doing in fulfilling their legal duties to keep the streets clean.

Whilst prompt removal of incorrectly presented waste is important to prevent littering, it is also paramount that the incorrect behaviour is addressed, to prevent recurring issues.

### **3.2 Recycling Education**

Each Local Authority in Wales must achieve the Welsh Government recycling performance target of 70% by 2024/25. In order to achieve this there is a focus to increase recycling in a sustainable manner. If a Local Authority does not meet recycling performance targets, it may result in the levying of a substantial financial penalty by Welsh Government.

The Education and Enforcement team are essential to helping the Council achieve statutory recycling targets. The Education and Enforcement team provide advice and information to residents on how to present their household recycling and waste in order to change behaviour. If households continue to store or present their waste and recycling incorrectly – despite having received advice and information - enforcement action will take place. To instil long-term behavioural change the education enforcement team work towards a three-tiered approach.

1. Education, Engagement and Monitoring
2. Investigation / Enquiries
3. Formal Enforcement
  - a. Warning Notice (under s.46 of the Environmental Protection Act)
  - b. Prosecution or Fixed Penalty Notice (FPN), where applicable

Offences tackled using this approach include:

- Waste presented in the wrong container
- Waste presented on the wrong day/week
- Bins left on the highway

*Note: This three-tiered approach does not apply to zero tolerance offences such as:*

- *Commercial waste duty of care (see below)*
- *LEQ Offences and Fly-tipping (see below)*

### **3.3 Waste accumulations in frontages**

Waste accumulations can occur in both frontages and gardens. Most commonly, they arise in linked properties with small frontages. The process for tackling waste accumulations can take several weeks to complete.

Firstly, officers must issue an intention to serve notice, under S.16 of the Local Government (Miscellaneous Provisions) Act 1976. The Notice requires the landowner to remove waste accumulation that is deemed to be detrimental to the Local Environmental Quality within 7 days. Failure to comply with the requirements of the Notice, without reasonable excuse, will result in FORMAL notice to execute works. This can be done under either S.215 of the Town and Country Planning Act 1990 or S.4 of the Prevention of Damage by Pests Act 1949.

In the case of a s.215 notice, the landowner must remove waste accumulation that is deemed to be detrimental to the Local Environmental Quality within 28 days. Failure to comply with the requirements of the Notice, without reasonable excuse, will result in prosecution. A Works in Default will be applied to the land (whereby officers remove the waste) and subsequent charges will be added as part of the prosecution.

A S.4 Notice can be used as an alternative to the s.215 pests are found to be present on land. In the case of a s.4, a “reasonable period” must be specified in the notice allowing time to comply with the necessary works following inspection. Failure to comply with the requirements of the Notice, without reasonable excuse, will result in prosecution. A Works in Default will be applied to the land and subsequent charges will be added as disclosure as part of the prosecution.

In addition to the above, officers have the authority to issue a Statutory Nuisance notice under S80 of the Environmental Protection Act 1990. The abatement notice is issued when an authorised officer is satisfied that a statutory nuisance exists; the accumulations are persistent and becoming a nuisance. The abatement notice instructs the landowner to execute works and take necessary steps to stop the problem re-occurring in the future.

The adoption of Community Protection Notices (see Appendix 3) will help to strengthen the teams enforcement powers in this area.

### **3.4 Trade Waste Enforcement**

The Education and Enforcement team are responsible for ensuring the correct management of waste by both domestic and commercial properties. Action can be taken in relation to commercial waste where:

a) businesses fail their waste ‘duty of care’ by avoiding payment of commercial waste collection and disposal charges (s.34(5) of the Environmental Protection Act). Where businesses are unable to produce a Waste Transfer Note to prove that they have appropriate waste disposal arrangements in place, officers can issue a Fixed Penalty of £300.

b) where waste is presented incorrectly (s.47 of the Environmental Protection Act). Officers are able to issue section 47 notices to businesses at any time to set out the requirements of the service. Under the provisions of the Environmental Protection Act 1990, following receipt of this Notice the businesses will be required by law to comply with the arrangements for placing their waste out for collection. A Notice has no true end date, as long as the business rate payer / LTD company remains the same.

A person/business who fails, without reasonable excuse, to comply with the requirements of this Notice shall be liable on summary conviction to a fine not exceeding £1,000 and a criminal record. Cardiff Council may alternatively offer the opportunity of discharging any liability to conviction for an offence by payment of a Fixed Penalty of £100.

### **3.5 Fly-tipping and Local Environmental Quality (LEQ) Enforcement**

Tackling fly-tipping is a corporate priority in Capital Ambition. Local Authorities and Natural Resources Wales have powers under the environmental Protection Act 1990 to

investigate fly-tipping incidents and to prosecute those who are found to have broken the law. In 2018, we adopted the powers under the Unauthorised Deposit of Waste (Fixed Penalties) (Wales) Regulations 2017, enabling us to issue £400 FPN's for small scale fly-tipping. Large-scale fly-tipping must still be dealt with via prosecution. However, the Single Justice Procedure is now in place and seeks to expedite the legal process around certain offences (see Section 5).

The team continue to implement a zero tolerance approach to all Local Environmental Quality offences, such as litter, dog fouling, fly posting and fly tipping. These environmental issues can seriously blight a neighbourhood, increasing people's fear of crime and lowering their quality of life. The team ensure compliance with regulations in order to keep the streets clean and safe to achieve a more attractive city. The adoption of PSPO's (see Appendix 4) will further strengthen the teams abilities to tackle issues such as dog fouling.

### **3.6 High Hedges**

Part 8 of the Anti-social Behaviour Act 2003 allows local councils to deal with complaints about high hedges. When councils are determining a complaint, they must first decide whether the height of the high hedge is having an adverse effect on a neighbors' enjoyment of their home and/or its garden or yard. If it is, then councils can order the owner of a high hedge to take action to put right the problem and stop it from happening again.

The legislation also allows councils to set and charge fees for handling these complaints. Historically, the power to take action in relation to high hedges rested with shared regulatory services, but it has now been adopted by the Street Scene department.

## 4 Education and Enforcement Actions

### 4.1 Promotion and Education

It is important to raise awareness about legal standards and promote good practice. Education is paramount and is key to changing the behaviour of residents and visitors to Cardiff about how to manage their waste correctly. Promotion is through press releases, briefings, website, outreach, advertisements, forums, leaflets and other forms of written guidance available to the public and businesses, and by face-to-face contact.

### 4.2 No Action (No evidence found)

This is when an investigation reveals at the time of the visit an offence has occurred but the identification of the offender cannot be determined. Contemporaneous notes and photographs will be input to the case for record purposes and monitoring will be undertaken.

### 4.3 Informal Action

Informal Action will be used to reinforce promotional activities and instances where, although the law may have been broken, there are mitigating circumstances and it would not be in the public interest to formalise proceedings or, it was not thought appropriate to take any further action. Confirmation of the informal action is made in writing.

When an informal approach is used, officers will ensure written documentation provided must:

- Contain all information necessary to identify the breach of legislation
- Indicate specific legislation contravened
- Clearly indicate any recommendations of good practice and to explain that they are not legal requirements

Informal action will take place where:

- The act or omission is not serious enough to warrant formal action;
- Past history indicates that it can reasonably be expected that informal action will achieve compliance;
- Confidence in the individual or company's management is high;
- The consequences of non-compliance will not pose a risk to public health or present unacceptable advantage to business operations or cause the public to lose confidence in the Council.

Informal action will **NOT** be considered when:

- Residents are already under a S46 Notice EPA 1990,
- Residents / visitors are contributing to littering under S87 of the EPA 1990 for;
  - heavily contaminating the recycling bag
  - using the recycling bag to contain general waste (domestic)
  - Failing to return the bag to the property after non-collection to take necessary action to dispose of waste in accordance with recycling scheme.

- Businesses are using the recycling bag for commercial waste service.

Where education or promotion is widely available (website / signage), offenders claiming ignorance of the law should not expect to be given a second chance before enforcement action is taken.

#### **4.4 Simple Caution**

A simple caution is a formal notice. A simple caution may only be considered where a prosecution could properly be brought; i.e. the case meets the standard required by the evidential stage. As a result, the existing procedures for considering a prosecution should be followed. A clear and reliable admission of the offence must be obtained before a simple caution can be considered. The mitigation provided meets the standard required at determination stage.

#### **4.5 Formal Caution**

A person should only receive one formal caution; and this caution lasts for 5 years. If the person subsequently commits a similar offence within 5 years, the case should proceed straight to prosecution and the original caution will be cited at Court.

The purposes of formal cautions are:

- To deal quickly and simply with less serious offenders.
- To avoid unnecessary appearance in criminal courts.
- To reduce the chance of offenders re-offending.

Before issuing a formal caution, which will usually be administered by letter, the following conditions must be satisfied:

- There must be evidence of guilt sufficient to give a realistic prospect of conviction.
- All issuing of all formal cautions will be in accordance with Council procedures.
- The suspected offender must have already admitted the offence during the investigation
- The suspected offender must understand the significance of a formal caution and give an informal consent to the caution.
- Should an offender not accept the offer of a formal caution, the team will recommend to the Authority's Legal Department to prosecute.

The Education Enforcement Team will only consider Simple Cautions or Formal Cautions / Warnings in the below circumstances:

- S34 of Environmental Protection Act 1980 - Duty of care (admission of guilt with mitigation)
  - Providing advice to trade waste producers about how to comply with their "Duty of Care" to manage their waste responsibly where there has been an admission of guilt and mitigation provided meets the standard required at determination stage.

- Providing advice to residents about how to make thorough checks when disposing of waste to a third party ;Waste Carrier licence checks, receipts in form of waste transfer notes for the safe transfer of waste, where there has been an admission of guilt and mitigation provided meets the standard required at determination stage.
- S43 of the Anti Social Behaviour, Crime and Policing Act 2014 - Community Protection Notice
  - A formal written warning will be issued if the officer considers that they are responsible for the unreasonable behaviour which is persistent and/or continuing in nature and is having a detrimental impact on the quality of life of others.

## 4.6 Formal Action

If appropriate, the authorised Officers will consider the application of formal enforcement action that can comprise one of the following alternatives.

- Formal warning
- Requests for information under caution
- Formal Notice Statutory Notices or other relevant enforcement action
- Prosecution

### 4.6.1 Formal warning

To reiterate education is not required to secure a successful prosecution and where education has been provided, offenders claiming ignorance of the law should not expect to be given a second chance before enforcement action is taken.

Formal warnings only applies in the below circumstances:

- Community Protection Notice - A formal written warning will be issued *Pursuant to S43 of the Anti Social Behaviour, Crime and Policing Act 2014*
  - If the officer considers that they are responsible for the unreasonable behaviour which is persistent and/or continuing in nature and is having a detrimental impact on the quality of life of others. The letter should be considered as formal notification for them to stop behaving in this manner and to put these problems right to avoid further consequence. Actions to take and timescales will be set.
- Repeatedly presenting incorrect recyclable waste in green bags as part of the behavioural change campaign.
  - A FORMAL WARNING Letter with formal instructions on how to present recycling waste.
  - Failure to adhere to this warning will result in a formal S46 Notice EPA 1990

As per Informal Action a warning or caution will **NOT** be considered when:

- Residents are already under a S46 Notice EPA 1990,
- Residents / visitors are contributing to littering under S87 of the EPA 1990 for;
  - heavily contaminating the recycling bag
  - using the recycling bag to contain general waste (domestic)



- Failing to return the bag to the property after non-collection to take necessary action to dispose of waste in accordance with recycling scheme.
- Businesses are using the recycling bag for commercial waste service.

#### **4.6.2 Requests for information under caution**

Where evidence is obtained and further investigations are to be conducted the authorised officer will request for further information using relevant legislation to the offence committed and/ or S16 The Local Government (Miscellaneous Provisions) Act 1976 and Data Protection Act 1998. This request will be made in writing in the following ways:

- enquiry form,
- request for information notice
- formal invite to interview under caution (PACE).

***This applies predominantly in the below circumstances:***

- S87 EPA 1990:
  - Standard Domestic Waste Enquiry – bagged waste deposited contributing to littering
  - Littering – standard enquiry to registered keeper for litter thrown from a vehicle
- S34 EPA 1990:
  - Standard Commercial request for Waste Transfer Note date specific (up to 2 years)
  - Standard Commercial request for Waste Transfer Note - bagged waste deposited.
  - House hold waste duty of care contributing to Fly tipping - Interview under caution (PACE)
- S33 EPA 1990
  - Fly tipping - Interview under caution (PACE)

#### **4.6.3 Formal Notices, Statutory Notices or other relevant enforcement action**

Although it is intended to prosecute, effective action needs to be taken to remedy conditions as quickly as possible. In general, failure to comply with a written and served statutory notice makes the recipient liable to prosecution.

In some cases the Council is able to carry out works to comply with the notice and recover the costs of doing so from the recipient of the notice. Such case will be considered on an individual basis and works in default may be carried out. In certain circumstances it is possible to prosecute as well as serve a notice: failure to comply with the notice would be an additional offence.

Will be considered where:

- There are significant contraventions of legislation;

- There is a lack of confidence that the individual or company will respond to an 'informal' approach;
- There is a history of 'non-compliance';
- The consequences of 'non compliance' posing a serious risk to public health, or creates a significant advantage to a business operator;

#### **4.6.4 Prosecution**

Prosecution will be progressed where there has been blatant disregard of the law, or a refusal to achieve even the basic legal minimum requirements. The relevant Officer will consider referring a case for prosecution when:

- It is appropriate in the circumstances, as a way to draw attention to the need for compliance with the law and the maintenance of standards required by law, especially where there would be a normal expectation that a prosecution would be taken, or where, through the conviction of offenders, others may be deterred from similar failures to comply with the law;
- Where there is the potential for considerable harm arising from the breach;
- The gravity of the offence, taken together with the general record and approach of the offender warrants it.

The decision to prosecute will always take account of the criteria set down in the Code for Crown Prosecutors. Before deciding to prosecute, there must be sufficient evidence for a realistic prospect of conviction, taking account of any defence that may be available, and it must be in the public interest.

The following public interest criteria will normally be taken into account when deciding on the relevance of legal proceedings, although this list is not exhaustive:

- The prevalence of the type of offence; and whether the offence involves a flagrant breach of the law such that public health and safety or well being is or has been put at risk, or where unacceptable business advantage is gained;
- The need for a suitable deterrent;
- The risk of danger or injury to the public;
- The failure to comply with a statutory notice or respond to advice about legal requirements;
- The disregard of legal requirements for financial reward;
- Significant financial loss, potential or actual, to a third party;
- Whether the investigation was the result of a complaint by a third party;
- A history of similar offences;
- Persistent breaches of legislation;
- Where fraud, gross negligence or guilty knowledge is a factor, and
- Minor breaches of a number of statutes.
- The alleged offender has failed to correctly identify the potential risk after being given ample opportunity to comply with legal requirements of an authorised officer;
- The evidence has been evaluated in accordance with the Code for Crown Prosecutors and there is a realistic prospect of conviction

- Relevant, admissible, substantial and reliable prospect evidence is available that an offence has been committed;
- It is in the public interest to prosecute.

Where possible, an offender will be told as soon as sufficient evidence is obtained that a prosecution may follow and a written Summons will be sent to the defendant. Where appropriate a prosecution will be commenced without prior warning and will be brought without unnecessary delay.

Once the decision to refer a case for Prosecution has been made by the relevant Officer, a case file will be submitted either via Single Justice Procedure or via Legal Services.

#### **4.7 Fixed Penalty Notices (FPN's)**

A fixed penalty notice offers the ability to discharge any liability to prosecution for the criminal offence; in respect of specified offences, with payment of the fixed penalty.

This should be paid no later than 14 days of the date on the penalty letter.

FPN's may only be served by authorised Officers. Officers will not issue a fixed penalty notice unless:

- The offence justifies prosecution;
- There is believed to be sufficient evidence to enable follow up proceedings should the offender not pay the charge within the stated payment period; and
- It will act as a sufficient deterrent against re-offending.

In all fixed penalty cases Cardiff Council can prove beyond reasonable doubt that an offence has been committed and intend to prosecute. All FPNS will be issued in accordance with the guidance issued by the Welsh Government. The following circumstances are likely to warrant the use of an FPN:

- 1) The offence of failing to comply with the requirements of a Notice.
- 2) Where an Officer believes there are "reasonable grounds" to consider an offence has been committed, and
- 3) Where there is a suitable witness or witnesses to the offence and the offender can be clearly identified.
- 4) The evidence gathered by an authorised officer proves beyond reasonable doubt that the offence has been committed.

If the penalty is paid within this time frame no further enforcement action will be taken. If a fixed penalty is not paid within the prescribed period, legal proceedings will be considered and the offender will be prosecuted. At this stage, and only at this stage, the defendant can provide mitigation to the offence.

## **5 Single Justice Procedure (SJP) and the Magistrates Court**

The Single Justice Procedure (SJP) is part of the government strategy to transform summary justice to:

- Make it simpler, faster and more proportionate and
- Ensure that the best use of magistrate court time is made so that they can focus on cases which have the biggest impact on their communities

The SJP requires:

- A procedural Notice to be served on the Defendant, with the Supporting documents:
  - 1) Statement of offence referring to exhibits
  - 2) Certificate of service
  - 3) Single justice procedure means form
- The notice will tell you who has brought the case against you (Cardiff Council), the offence, how to make a plea, and if you can make a plea online.
- The defendant has 21 day to respond to the notice.
  - Alternatively the defendant has 21 days to pay the original FPN and case costs (Administration Payment Fee) to discharge liability for prosecution.
- The response would need to plead either guilty or not guilty.
  - Plead guilty - the magistrate will make a decision based on the information they have. The defendant will get a letter with the magistrate's decision.
  - Plead not guilty – the defendant will have to go to court and give information to the magistrates in person. The defendant will get a letter telling them when to go to court.
  - If you do not respond to the single justice procedure notice within 21 days, the magistrate will make a decision about your case without your say. This could mean that if you are found guilty and sentenced, there will be no reduced sentence for a guilty plea. Your fine or penalty points may also be higher. Money may be taken from your pay or benefits.
- Should help be required with the defendants notice they can get legal advice or free advice from Citizens Advice.

If a guilty plea is received, or a conviction is made by a single justice procedure following no response from the Defendant, the single justice procedure is able to impose a financial penalty or impose an order of absolute or conditional discharge.

### **5.1 Magistrates Court**

If no guilty plea is received the case file will be submitted to Legal Services. Legal Services will consider the entire case and if they agree that the case is suitable for Prosecution, they will then exercise the delegated power of the City and County Solicitor to lay any information at Cardiff Magistrates Court.

## **6. Complaints and Disputes**

### **6.1 Appeals**

There is no right of appeal to the Council for Fixed Penalty Notices issued under Environmental or Highway legislation.

There is no appeals process as it is a criminal offence with a penalty notice. It is not a civil offence, such as parking, which imposes a fine and provides an appeals process. The opportunity to disagree would be through the Magistrates Court. The matter will be referred to the Magistrates' Court should the fixed penalty remain unpaid, or should instructions be made by the offender to Cardiff Council to do so.

Any enquiries or disputes regarding fixed penalties will not be progressed as part of Cardiff Council's Corporate Complaint Procedure or The Public Services Ombudsman for Wales.

### **6.2 Complaints**

The service accepts complaints relating aspects outside of the issuing of a Fixed Penalty Notice, such as the behaviour of Officers. These complaints will follow the Complaints Policy but will not have any influence on the Fixed Penalty Notice.

### **6.3 Formal Review**

An Elected Member may make a request for a formal review of a concern to the Corporate Director, Director or Assistant Director managing the service.

The request can only be made in the below circumstances:

- Requests made on behalf of a person who is a vulnerable adult
- Documentation is provided in relation to condition which directly affects capacity to progress the case; such as mental health condition or the capacity of the individual to understand.

The outcome of the formal review will be a decision as to whether to proceed with the case or take reasonable measures to provide additional support.

Examples of support services are:

- Additional waste capacity assessments: this allows an increased level of general, non-recyclable waste to be presented for collection on the understanding residents are unable to separate their waste for recycling
- Home educational visits: information for residents in a preferable, easy to understand format. For example, audio recordings or easy read documents for residents.
- Registered collection service: our collection crews will enter the front boundary of a property to collect recycling and waste. This alleviates residents' concerns that they are going to put recycling or waste out on the incorrect day
- A visit by the independent support living team: the team visit vulnerable residents at their properties to provide varying levels of support. This team have direct contact with waste management and are able to request support on their client's

behalf. If any of these services are not appropriate, we will make every attempt to offer some form of reasonable adjustment to the scheme.

## Appendices

### Appendix 1 – Enforceable Offences

This appendix is a list of the main enforceable offences utilised by Cardiff Council. The list is not a defined list and enforcement of further offences may be take place depending on circumstances and delegated authority.

Enforcement type	Legislation / ACT	Section	What this enforces	Failure to comply with notice may lead to prosecution / works in default / FPN / Charge.
<b>Waste Presentation Domestic</b>	Environmental Protection Act 1990	S46 Notice	The section 46 notice allows the council to serve a notice on an occupier requiring them amongst other things, to separate their waste for recycling and/or to put out their refuse at specific times and/or in containers we supply sets out the requirements of the service. On receipt of this Notice the residents will be required by law to comply with the arrangements for placing their waste out for collection. If this notice is not complied with, then the Council can prosecute or issue a Fixed Penalty Notice (FPN) which if unpaid may result in prosecution for the original offence. A Notice has no true end date, as long as the occupants remain.	Prosecution / FPN £100 *S47za (2)
<b>Waste Presentation Commercial</b>	Environmental Protection Act 1990	S47 Notice	The section 47 notice sets out the requirements of the service. Under the provisions of the Environmental Protection Act 1990 following receipt of this Notice the businesses will be required by law to comply with the arrangements for placing their waste out for collection. A Notice has no true end date, as long as the business rate payer / LTD company remains the same.	Prosecution / FPN £100 (S47za)
<b>Waste Presentation Duty of Care Commercial</b>	Environmental Protection Act 1990	S 34(5)	Regulation 4 the Environmental Protection (Duty of Care) Regulations 1991, Requiring Production of Written Documentation Regarding the Transfer of Commercial (Controlled) Waste	Prosecution / FPN £300 S34 A(2)
<b>Waste Presentation Duty of Care Domestic</b>	Environmental Protection Act 1990	S34 (2A)	it shall be the duty of the occupier of any domestic property to take all such measures available to him as are reasonable in the circumstances to secure that any transfer by him of house hold waste produced on the property is only to an authorised person.	the amendment to act under section 34(2A) which allows Welsh waste collection authority to issue a fixed penalty of £300.
<b>Litter</b>	Environmental Protection Act 1990	S87	to throw down or deposit litter open to the highway.	Prosecution / FPN £100 (S88(1))
<b>Abandoned Shopping Trolley</b>	Environmental Protection Act 1990	S99	Schedule 4 applies where any shopping or luggage trolley is found by an authorised officer of the local authority on any land in the open air and appears to him to be abandoned.	The charge of £75 is payable to the authority on demand.

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<b>fly tipping</b>	Environmental Protection Act 1990	S33	Fly-tipping is the term used to describe waste illegally deposited on land. The offence of fly-tipping and the additional offences of 'knowingly causing' or 'knowingly permitting' fly-tipping are set out in Section 33(1)(a) of the Environmental Protection Act 1990. Including amendment to act under Section 33ZB which allows a Welsh waste collection authority to issue a fixed penalty of £400 for small scale fly tipping	On 25th October 2017 an amendment of the Environmental Protection Act 1990 was introduced enabling an authorised officer of a Welsh waste collection authority to issue a Fixed Penalty for fly-tipping in contravention with The Unauthorised Deposit of Waste (Fixed Penalties) (Wales) Regulations 2017 Prosecution / FPN £400
<b>waste Carrier licence</b>	Control of Pollution (Amendment) Act 1989	Section 5	Requiring Production of Written Documentation Regarding the Proof of Authority to Transport Controlled Waste	Prosecution / FPN £300 S5B(2)
<b>Waste storage / accumulation on private land (frontage / rear / private property)</b>	The Local Government (Miscellaneous Provisions) Act 1976	Intention to serve notice S16	The Notice to landowner to remove waste accumulation that is deemed to be detrimental to the Local Environmental Quality must be removed 7 as per notice	Failure to comply with the requirements of the Notice, without reasonable excuse, will result in FORMAL notice to execute works : S215 Notice - Town and County Planning Act 1990 or S4 Notice - Prevention of Damage by Pests Act 1949
<b>Waste storage / accumulation on private land (frontage / rear / private property)</b>	Town and County Planning Act 1990	S215	The Notice to landowner to remove waste accumulation that is deemed to be detrimental to the Local Environmental Quality must be removed within 28 days as per notice.	
<b>Waste storage / accumulation on private land (frontage / rear / private property)</b>	Prevention of Damage by Pests Act 1949	S4 Notice	The Notice to landowner to remove waste accumulation where pests are found to be present on land a "reasonable period" must be specified in the notice allowing time to comply with the necessary works following inspection.	
<b>Statutory Nuisance</b>	Environmental Protection Act 1990	S80 Notice	The abatement notice to the landowner is issued when an authorised officer is satisfied that a statutory nuisance exists; the accumulations are consistent and becoming a nuisance. The abatement notice instructs the landowner to execute the works and make necessary steps to stop the problem in the future.	Failure to comply with the requirements of the Notice, without reasonable excuse, will result in prosecution. A Works in Default will be applied to the land and subsequent charges will be added as disclosure as part of the prosecution.
<b>Abandoned Vehicles on the highway.</b>	Refuse Disposal (Amenity) Act 1978	S.2	Notice to owner to remove vehicle	S.10 of The Clean Neighbourhood and Environment Act 2005 FPN for breach of notice



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	The Clean Neighbourhood and Environment Act 2000	S.10	Breach of notice	A person/business who fails, without reasonable excuse, to comply with these requirements of this Notice shall be liable on summary conviction to a fine not exceeding £1,000 and a criminal record. Cardiff Council may alternatively offer you the opportunity of discharging any liability to conviction for an offence by payment of a Fixed Penalty of £200
	Road Traffic Regulation Act 1984	S.99	Order Offender to remove abandoned Vehicle	Failure to comply with the requirements of the Notice, without reasonable excuse, will result in FORMAL notice to execute works
	Refuse Disposal (Amenity Act) 1978 Power	S.3		S2A(1) FPN £200
<b>fly posting</b>	Anti-social Behaviour Act 2003	s43	Displaying advertisement in contravention contrary to section 224(3) of the Town and Country Planning Act 1990.	FPN for failing to comply with Section 132 of Highways Act 1980 (as inserted by s43 Anti-Social Behaviour Act 2003) – placing an unauthorised mark on highway without lawful authority or causing or producing graffiti or flyposting.
	Town and Country Planning Act 1990.	224(3)		
<b>interview under caution</b>	Police and criminal evidence Act 1984	codes of practice	PACE - interview under caution	leads to evidence - Prosecution / FPN decision
<b>community protection notices</b>	Anti-social Behaviour, Crime and Policing Act 2014	S43	The community protection notice (CPN) will tackle the conduct of individuals / businesses, which is/are persistent and/or continuing in nature and is having a detrimental impact on the quality of life of others.	Prosecution / FPN
<b>public space protection notices</b>	Anti-social Behaviour, Crime and Policing Act 2014	s59	The PSPOs would be considered for Dog Control Orders: FAILURE TO REMOVE DOG FOULING FAILURE TO DEMONSTRATE MENAS TO REMOVE DOG FOULING DOGS ON LEADS BY DIRECTION DOG EXCLUSION	Prosecution / FPN
<b>dog fouling</b>	Dogs (Fouling of Land) Act 1996		FAILURE TO REMOVE DOG FOULING	Prosecution / FPN
<b>high hedges</b>	Anti-social behaviour Act	S69	Remedial notice will be issued under Section 69 of the Anti-social behaviour Act, The notice will be sent to the owner of the property and they will be given a specified time to carry out the works instructed by us.	If the owners fail to do so they will be prosecuted for the offence under S.75 of the Anti-social behaviour act. The courts will usually demand that they carry out the works or face further prosecution by means of a fine.

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<b>unauthorised distribution of literature on designated land</b>	Environmental Protection Act 1990	Schedule 3A para. 7(2)	Breach of notice	Prosecution / FPN
<b>Request for Info</b>	Environment Act 1995	S108	request information to assist with fly tipping investigations.	Prosecution
<b>Request for Info</b>	Data Protection Act	S29	request information to assist with investigations	Prosecution

## **Appendix 2 - Enforcement Concordat**

The Council has adopted the public sector 'Enforcement Concordat', which offers best practice guidance and promotes good standards of enforcement. This means the Council will try and persuade people to change their behaviour through information, education and advice, but will not hesitate to take enforcement action; such as issuing Fixed Penalty Notices or prosecuting when appropriate. This approach sends a clear message of 'zero tolerance' to those individuals or businesses who continue to spoil the environment. The Street Scene Education and Enforcement Team aim to conform to the principles outlined in the Concordat and apply them in the following ways:

### Openness and Helpfulness

The Council will publicise this enforcement policy so people know what standards are expected. The Street Scene Education and Enforcement team will help residents and visitors to comply with the law and will explain what they are doing and why. They will inform people about their rights of appeal, where applicable and make sure people know how to make a complaint. They will try to help people who cannot read or speak English by providing literature in their language and educate them with the same message.

### Proportionality, consistency and priorities

The Education and Enforcement team will carry out their duties in a fair, reasonable and consistent manner. They will take appropriate enforcement action when required to do so. Any action taken will fit the seriousness and prevalence of the crime. Each case is unique with certain offences being worse than others and therefore the enforcement action applied will potentially differ. The Education and Enforcement team will have sufficient training to apply law and work to this policy in a fair and consistent way. To ensure consistency Senior Officers will regularly audit the work of enforcement officers for accuracy and consistency.

In making a decision regarding which enforcement option is appropriate in a particular case, Street Scene Education and Enforcement Officers will consider and take into account the following:

- The nature of the offence
- Whether it is in the public interest
- Any explanation offered by the defendant
- The age of the defendant
- The previous relevant history, if any
- The ability of any important witnesses and their willingness to co-operate
- Whether other action such as the issue of a fixed penalty notice would be more appropriate or effective
- The advice contained in the Code for Crown Prosecutors

Having considered all the relevant information and evidence, the Street Scene Education Enforcement Officer must decide what type of action to take:

- Promotion and Education
- No Action (No evidence found)
- Informal Action

### Appendix 3 – Education and Enforcement Policy

- Simple Caution
- Formal Caution
- Formal Action

## Appendix 3 - Community Protection Notices

The community protection notice (CPN) will tackle the conduct of individuals / businesses, which is/are persistent and/or continuing in nature and is having a detrimental impact on the quality of life of others. These are designed to stop a person aged 16 or over, a business, or an organisation committing anti-social behaviour which spoils the community's quality of life.

Definitions of Anti-social behaviour

- 1) Conduct of individuals/ businesses which is persistent and/or continuing in nature and is having a detrimental impact on the quality of life of others
- 2) Conduct capable of causing a nuisance or annoyance to a person in relation to that persons occupation of residential premises
- 3) Conduct which is capable of causing housing related nuisance or annoyance to any person
- 4) Conduct that has caused or is likely to cause harassment alarm or distress to any person.

The CPN can only be issued if:

- Firstly a complaint is received on how it is affecting their quality of life.
- Secondly the inspection verifies the unreasonable behaviour.
- Thirdly the individual or business has been given a written warning telling them to cease their conduct and given "enough time" to deal with the matter.
- Fourthly the behaviour continues to be unreasonable and a formal CPN is issued.

Failure to comply with this notice will result in either prosecution, or the option of a Fixed Penalty Notice that cannot exceed £100. Alternatively, the Council also has the option of carrying out remedial work where the requirements of a CPN are not carried out provided that the land is open to the air. The local authority can then reclaim the costs from the "defaulter".

Formal Stages:

- 1) Complaint is received regarding conduct / behaviour of others that is persistent and/or continuing in nature and is having a detrimental impact on the quality of life of others.
- 2) Inspection / Assessment of the behaviour by authorised officer. Officers will consider the behaviour and will take action as necessary.
- 3) A formal written warning (appendix 1) will be issued *Pursuant to S43 of the Anti Social Behaviour, Crime and Policing Act 2014* if the officer considers that they are responsible for the unreasonable behaviour which is persistent and/or continuing in nature and is having a detrimental impact on the quality of life of others. The letter should be considered as formal notification for them to stop behaving in this manner and to put these problems right to avoid further consequence. Actions to take and timescales will be set.

- 4) A Community Protection Notice (CPN) is issued if they fail to comply with the actions / requirements within the timescales given and their behaviour continues to have a detrimental effect on the quality of life of others. The CPN requires that they must comply with the following prohibitions/positive requirements/specified actions that are believed necessary to:
  - (i) Prevent the detrimental effect your conduct is having on the quality of life of those in the locality from continuing or recurring; and/or
  - (ii) Reduce the detrimental effect your conduct is having on the quality of life of those in the locality; and/or
  - (iii) Reduce the risk of continuance or recurrence of your conduct that is having a detrimental effect on the quality of life of those in the localityThe notice is a formal notification that they **MUST** take the detailed actions within the timescales.
- 5) Their Right to appeal against the notice to the magistrates' court, within 21 days beginning with the date of service of the notice on them. Whilst an Appeal is "in progress", any requirement imposed by this notice to stop doing something remain in effect unless the court orders otherwise and any other requirements imposed by the notice is of no effect. For this purpose, an appeal is "in progress" until it is finally determined or is withdrawn.
- 6) BREACH OF CPN is a criminal offence. If they fail without reasonable excuse to comply with the requirement(s)
  - (i) They may be issued with a fixed penalty notice of £100
  - (ii) They may be prosecuted and convicted.

## **Appendix 4 - Public Space Protection Orders (PSPO)**

The Public Spaces Protection Order would prohibit certain activities from taking place in a specified area or specify that certain things must be done to allow an activity to continue. Under these circumstances it might be that the area is not to be used for the exercising of dogs or that all fouling must be removed by the dog owner.

The Council does not currently have any dog controls in place across the city to control where dogs can go, whether they need to be on a lead or how many dogs a person can control at any one time.

These types of orders are designed to stop individuals or groups committing anti-social behaviour in a public space. The PSPO replaces dog control orders and allows the authority to designate public places for restrictions. Prohibition notices can be used for specific areas and/ or times, for example stopping dogs from entering playgrounds, schools grounds or restricting how many dogs could be taken through a public area by one person.

By adopting the PSPO the fine for any breach, including dog fouling would be £100. The PSPOs would be considered for Dog Control Orders:

- FAILURE TO REMOVE DOG FOULING
- FAILURE TO DEMONSTRATE MENAS TO REMOVE DOG FOULING
- DOGS ON LEADS BY DIRECTION
- DOG EXCLUSION

If the person in charge of a dog fails to comply with the requirements of the order, they will be committing a criminal offence unless:-

1. they have the consent from the owner, occupier or person in charge of the land, not to comply with the order;
2. they have a reasonable excuse for failing to comply; or
3. they fall within one of the other exemptions within the order, such as the exemptions in the order for disabled people, assistance dogs and working dogs.

The aim is to encourage responsible dog ownership and reduce other incidents involving dogs such as straying; dog bites; fouling on sports pitches and the dog fouling on our streets and green spaces. Such controls in play areas could also prevent problems becoming more serious and thus reduce the number of dog bites. Warnings can also be given to individuals who allow their dogs to roam freely without control causing nuisance in our communities. The Council will also should look to provide suitable dog walking areas in the locality, where other restrictions are in place.

Our joint commitments and service standards

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Area	What we will do:	What we expect from our customer	Service Standards
<p><b>Recycling and Waste Collections-traditional households</b></p>	<p>Collect your household rubbish on your scheduled day, between 6am-4pm in the specific container provided.</p> <p>Reserve the right to refuse the collection of any waste items that may cause harm or may have an affect on the health and safety of waste collection staff.</p> <p>Label all wheeled bins with the correct address and bin type.</p> <p>Collect a maximum of 5 re-useable garden sacks/ 2 green wheeled bins (garden waste) per collection.</p> <p>Return your containers to where we found them. This will be on the highway outside your property, an alternative agreed collection point or within your property boundary if a registered collection has been arranged.</p> <p>Replace any wheeled bins, damaged by our refuse collectors free of charge.</p>	<p>To present your bins, bags and caddies by 6am on your scheduled day of collection and no earlier than 4.30pm the day before. Bring all containers back onto the property by 9am the following day.</p> <p>Report any missed collections of your recycling and waste within 24 hours of collection. You can report a missed collection at any time on your collection day, once your collection status has changed to 'collected'. You can use the link <a href="http://www.cardiff.gov.uk/missedcollections">www.cardiff.gov.uk/missedcollections</a> to report a missed collection, or see your collection status.</p> <p>Recorded collections can be reported up to 48 hours after a failed collection.</p> <p>Place your containers on the nearest highway for collection at the above times, unless an alternative collection point has been agreed.</p> <p>Only use the recycling and waste containers provided- failure to do so may result in a Fixed Penalty Notice of up to £100 being issued.</p> <p>To not remove or replace your label.</p>	<p>We will aim to return within 48 if you report that we have not collected your general waste/garden waste/hygiene waste on the scheduled collection day.</p> <p>We will not return if your bin has a report against it, such as contaminated/overloaded.</p> <p>We will attempt to return before 2 working days if we know that we have missed an entire street/round due to a service failure. We will aim to update the re-scheduled collection date at <a href="http://www.cardiff.gov.uk/missedcollections">www.cardiff.gov.uk/missedcollections</a></p> <p>If your recycling or food waste is missed, we may return to collect on your next scheduled collection. We will collect any loose bags outside of your food waste caddy in this instance.</p> <p>We will check the vehicle CCTV cameras and trackers when all reports of non-collections are received. We will only return to make a re-collection if the report is found to be genuine.</p>



	<p>Place stickers onto your recycling or waste, letting you know if we can't collect them e.g. incorrect items.</p> <p>If you have a front garden, return your re-useable garden sack to your property boundary.</p> <p>Advertise, recommend and process all applications for hygiene waste collections.</p> <p>Offer an alternative collection point for hygiene waste, by agreement of customer and collection team.</p> <p>Remove properties from the hygiene service if hygiene bags have not been placed out for 4 consecutive collections.</p>	<p>To leave your waste containers at your property, if you are moving to another address.</p> <p>If you have a wheeled bin, all waste must fit inside your bin. Any bags outside your bin will not be collected, and may result in a Fixed Penalty Notice of up to £100 being issued.</p> <p>To make full use of the weekly recycling and food waste services available. To not abuse these services, by placing incorrect material into them to allow you a weekly collection of general waste. This may result in a Fixed Penalty Notice of up to £100 being issued.</p> <p>To maintain the condition of your wheeled bin and containers, and keep them within your property boundary at all times (except during your collection period).</p> <p>Not to compact waste tightly into your wheeled bin. If this happens your waste may not empty into our vehicle and re-collection would not be arranged.</p> <p>If your wheeled bin, or re-useable garden sack, is too heavy for collection, remove the excess waste before presenting for your next collection. As a guide, your bin should weigh no more than 20kg.</p> <p>To identify your correct collection dates and methods, by looking at all information</p>	<p>We will clear up any litter which has been created as a result of waste collection. If there is too much to clear with the equipment available, we will communicate with our Street Cleansing team to action.</p> <p>Report any issues on our incab devices for further action e.g, to identify any wheeled bins that we have damaged and need replacing.</p> <p>Replace your wheeled bin within 15 working days. This may increase in times of high demand</p> <p>You will receive a delivery of hygiene bags, and the date of your first collection, within 10 working days. This may increase in times of high demand.</p> <p>Investigate all reports of non-collections of hygiene waste, using all resources available.</p> <p>If the Council is at fault, re-collect your hygiene bags within 3 working days.</p>
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		<p>made available e.g.via the Cardiff Gov App, website, information at Hubs</p> <p>Ensure that no items of a hazardous nature are placed into your recycling and waste bags; consider the health and safety of our crews at all times e.g. wrap sharp objects before placing into your bags.</p> <p>To place your hygiene waste kerbside, unless an alternative collection location has been agreed. This must be requested at the time of the initial application.</p> <p>To put your hygiene waste in Council issue bags only for collection.</p> <p>To inform us if you no longer require the hygiene service or if you are moving house.</p> <p>To not use any verbal or threatening behaviour towards our staff.</p>	
<p><b>Recycling and Waste Collections-blocks of flats</b></p>	<p>Collect your household recycling and waste in the specific container provided and clear up any rubbish spilled during the collection.</p> <p>The above will happen at the same frequency as traditional household collections, unless additional arrangements have been made.</p> <p>We will collect and return your containers from an agreed collection</p>	<p><u>Landlords/developers/property management companies</u></p> <p>Proactively maintain contact with the Waste Strategy Team when planning any new development/making changes to existing development. This is to ensure:</p> <ul style="list-style-type: none"> <li>• A collection point and collection method is agreed.</li> <li>• Your bin store is accessible and safe for our crews to collect from.</li> </ul>	<p>We will return within 48 hours if you report that we have not collected your communal bins on the scheduled collection day, and there was no underlying cause for the missed collection (e.g. we will not return for contaminated bins).</p> <p>We will attempt to return within 48 hours if we know that we have missed an entire street/round due to a service failure.</p>

	<p>point, which should be agreed in the planning and development stage.</p> <p>Provide flat specific information including leaflets, and bin store signage.</p> <p>Have a dedicated officer to assist in improving recycling participation, and correct waste presentation, in blocks of flats.</p> <p>Replace any communal bins, damaged by our refuse collectors free of charge.</p> <p>Provide advice and support during the planning development stage, in relation to the type/number of bins required, access requirement for our crews and collection method statements</p> <p>Offer a sale of recycling and waste containers</p> <p>Offer a hygiene collection in blocks of flats.</p> <p>Reserve the right to not collect recycling and waste in incorrect containers, where containers are contaminated with incorrect items, or where a health and safety issue has been identified at the collection point.</p>	<ul style="list-style-type: none"> <li>You have an adequate number of recycling and waste bins for the development.</li> <li>Payment is made for bins and delivery in advance.</li> <li>Recycling/waste bins and information is available for your residents before they move in.</li> <li>We have a contact for the development, should any issues arise in the future e.g. contamination issues, lack of bins, health and safety issue identified.</li> <li>Regularly monitor the presentation of waste from your building, to ensure it is compliant with our waste collection requirements e.g. no additional bags outside of the bins. Make arrangements to remedy any incorrect presentation.</li> <li>If you choose to buy bins from an alternative supplier, they must meet the Council's specification. If they don't, we do not have to collect your waste until the situation is resolved.</li> <li>Allow access to the development between 6am-4pm on the day of collection.</li> </ul> <p>Further information can be found at <a href="http://www.cardiff.gov.uk/wasteplanning">www.cardiff.gov.uk/wasteplanning</a></p> <p><u>Residents</u></p>	<p>We will check the vehicle CCTV cameras and trackers when all reports of non-collections are received. We will only return to make a re-collection if the report is found to be genuine.</p> <p>If a non-collection of your food waste or recycling is reported, we may collect on your next scheduled collection. We will collect any additional green recycling bags outside of your bin in this instance.</p> <p>Any issues relating to the collection of communal bins will be recorded on our in cab device</p>
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	<p style="text-align: center; font-size: 48px; opacity: 0.3; font-weight: normal;">DRAFT</p>	<ul style="list-style-type: none"> <li>• Make full use of the recycling and waste collection schemes available at your block of flats</li> <li>• Let us know if you think recycling arrangements can be improved at your block of flats</li> <li>• Follow all recycling and waste presentation guidelines provided</li> <li>• Responsibly dispose of any bulky waste you have- do not simply leave within your bin store without making collection arrangements.</li> </ul> <p>Inform us of the specific collection point for your hygiene waste.</p> <p>Do not place hygiene bags in any other container for collection.</p> <p>Ensure full access between 6am-9pm for hygiene bag collection.</p> <p>To not use any verbal or threatening behaviour towards our staff.</p>	
<p><b>Provision of wheeled bins, food waste liners, green recycling bags, red striped waste bags and food caddies</b></p>	<p>Provide recycling and food waste equipment free of charge, and in a variety of ways to meet customer needs.</p> <p>Provide re-useable, garden waste bags for a small fee. These can be ordered by contacting C2C, if you use these at your property.</p>	<p>If you are unable to attend a local stockist, please order your recycling and food waste equipment for delivery before you run out. This will ensure you can still participate in all services available.</p> <p>Please use all equipment as specified by the Council. Incorrect use may result in a</p>	<p>Deliver food waste liners and green recycling bags to all local stockists twice a week.</p> <p>Where demand is consistently high, consider increased deliveries to stockists.</p>

	<p>Deliver a limited supply of red striped waste bags twice a year, enough to place out up to 3 bags per fortnightly general waste collection (bag areas only). This will be 3 rolls as standard.</p> <p>Replace wheeled bins, lost or stolen from a property, for a set delivery fee.</p> <p>Identify an appropriate local stockist within each electoral area of Cardiff, to allow the collection of a maximum of 2 rolls (1 additional for a neighbour) of green recycling bags and food waste liners per person.</p>	<p>Fixed Penalty Notice of up to £100 being issued.</p> <p>Green recycling bags should not be used for any alternative purpose e.g. transporting non-recyclable waste to HWRC/charity shops, used for business waste, used outside of Cardiff.</p> <p>Be polite and courteous to staff within our local stockists, who have been asked to implement a control process to allow you a maximum of 2 rolls of bags per visit.</p> <p>Let us know if you require an alternative delivery address, where initial delivery has been unsuccessful, or you know you will not be home to receive delivery.</p> <p>To not use any verbal or threatening behaviour towards our staff.</p>	<p>To deliver the maximum stock of bags that can be held at each stockist, with consideration to available space.</p> <p>Deliver all ordered items within 15 working days of the order being received. This may increase in times of high demand</p> <p>Post rolls of bags through your letterbox, where design allows.</p> <p>Leave a delivery note in the following circumstances:</p> <ul style="list-style-type: none"> <li>-where we have been unable to deliver item/s.</li> <li>- where item/s have been left at an alternative location.</li> <li>- where you have paid for the item/s.</li> </ul> <p>We will deliver wheeled bins to the frontage of your property.</p> <p>We will not leave garden waste sacks on your doorstep. If your letter box allows, they will be posted. Alternatively, you must be home for delivery.</p> <p>We will not leave red striped waste bags on your doorstep. They will be posted through your letter box. Where no letter box is available, or no access to communal areas can be made, a note of unsuccessful delivery</p>
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			<p>will be made. We will send you a letter to allow you to collect your bags</p> <p>Visit your property twice to attempt delivery of chargeable items.</p>
<p><b>Bulky Waste Collections</b></p>	<p>Offer a bulky waste collection service, for large items.</p> <p>Work to procure a partnership with a local charity, to further enhance the re-use of bulky items that can be used again.</p> <p>We may be able to offer assistance with the removal of your bulky waste, if arrangements are made in advance.</p> <p>Inform our fly-tipping removal teams of all bulky waste collection bookings, to ensure they are not incorrectly assumed as fly-tipped items.</p> <p>Provide you with the closest date for collection, in line with demand for the service and resource available. You will be informed of your proposed collection day before any payment is made.</p>	<p>Present your items in line with the terms and conditions agreed to during your booking process.</p> <p>Seek alternative solutions to a bulky waste collection service, in line with the waste hierarchy e.g. provide for re-use, consider repair etc</p> <p>To not use any verbal or threatening behaviour towards our staff.</p>	<p>Collect your items between 6am-4pm on the day of collection.</p> <p>If a collection is missed due to service disruption, our contact centre staff will be informed. We will arrange to make a re-collection as soon as possible.</p> <p>We will update our in cab devices which will identify any reason why we have been unable to collect your bulky waste item.</p> <p>Leave a calling card to advise of any issues with collecting your item/s or confirm item has been collected</p>
<p><b>Household Recycling Centres (HRC)</b></p>	<p>Offer free to access HRCs for all Cardiff residents, with an annual allowance.</p>	<p>To book a slot online or via the Cardiff Gov app before attending site. Bookings can be made via telephone if you are unable to book online.</p>	<p>We will open 7 days/week (excluding Christmas Day and New Year's Day).</p>

	<p>Ask all customers for proof of Cardiff residency at the point of entry and refuse access to those bringing waste from other Local Authority areas.</p> <p>Ask customers to maximise opportunities for recycling and implement a 'no mixed waste' policy to ensure recycling has been maximised.</p> <p>Provide assistance and offer advice to all customers.</p> <p>Maintain service provision 7 days a week (with the exception of Christmas and New Year).</p> <p>Operate a van booking in procedure for those with larger vehicles or bringing in larger volumes of waste. This procedure limits individuals to 10 bookings/year.</p> <p>Update social media where possible, in the case of unexpected needs to close. Make cancellations of bookings, to provide you with an email notification of cancellation where an email address has been provided.</p>	<p>To present your proof of Cardiff residency, and booking confirmation</p> <p>To separate as many items as possible for recycling and follow any safety instructions provided by staff.</p> <p>To not use any verbal or threatening behaviour towards our staff.</p> <p>To use our commercial site at Bessemer Close for Commercial waste, or for any waste that you are unwilling/unable to separate for recycling.</p>	
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<p><b>Recycling and waste education</b></p>	<p>Implement and promote campaigns to increase recycling participation across the City.</p> <p>Let you know if your collections will be delayed due to Bank Holidays or inclement weather via our waste app, website and C2C contact centre.</p> <p>Ensure information regarding recycling and waste services is available to the public via a range of communication methods including:</p> <ul style="list-style-type: none"> <li>- outreach sessions</li> <li>- social media e.g. twitter and facebook</li> <li>- website updates</li> <li>- Leaflets and letters</li> <li>- Advertising</li> </ul> <p>Form partnerships with key stakeholders including student union, local volunteer groups, charities.</p> <p>Arrange assessments for residents who may struggle to present waste for collection on the highway- these are known as registered collections.</p> <p>Arrange assessments for residents who feel they require additional capacity for non-recyclable waste.</p>	<p>Provide us with correct information to enable us to complete our household visits.</p> <p>Allow us access to the frontage of your property if requesting a registered collection. Our officers will need to complete a risk assessment.</p> <p>Be open and honest when explaining why you need assistance with waste collections, or additional non-recyclable waste capacity.</p> <p>Be polite and courteous to our staff, who are aiming to help and are asked to relay key messages.</p> <p>Use your chosen communication reminder method to keep informed of recycling and waste messages/collection days etc.</p> <p>Take personal responsibility to ensure you are participating in all recycling schemes available. Contact us if you require assistance.</p> <p>Let us know if you no longer require a registered collection at your address.</p> <p>Respond to registered collection review letters, to let us know if you still require the service.</p>	<p>Organise at least 1 outreach session a month, and inform you where we will be via social media and the website <a href="http://www.keepcardiffidy.co.uk">www.keepcardiffidy.co.uk</a></p> <p>Visit you within 10 working days to arrange a registered collection.</p> <p>Process any agreed registered collections by the end of the working day; your assistance will begin between 7-10 days.</p> <p>Visit you within 10 working days to arrange an additional capacity bin assessment.</p> <p>If any additional/larger bins are required, order these within 24 hours of the visit.</p> <p>Provide basic recycling and waste collection information in the 15 most spoken languages across the City.</p>
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	<p>Regularly review all properties signed up for a registered waste collection, to ensure they are still required.</p> <p>Complete regular monitoring of the City's participation in recycling schemes using a range of methods to include:</p> <ul style="list-style-type: none"> <li>- desk based data analysis</li> <li>- on street monitoring</li> </ul> <p>Produce improvement plans &amp; changes of schemes when considering results of public satisfaction surveys.</p> <p>Continue the promotion of recycling and waste minimisation messages for school children, through our Really Rubbish Campaign.</p>		
<p><b>Compliments and complaints</b></p>	<p>Use your feedback to help us to improve our services.</p> <p>If something goes wrong, we will endeavour to put it right quickly.</p> <p>If possible, we will take action to ensure it doesn't happen again.</p> <p>We will ensure all compliments received reach our operational teams, via staff screens in communal areas.</p>	<p>Provide us with feedback via the various contact methods available to you.</p>	<p>Acknowledge your complaint within 5 working days of it being received.</p> <p>Aim to respond to your complaint within 20 working days.</p> <p>Let you know within the 20 working day period if we think it may take longer to investigate, and keep you informed.</p>

## Appendix 5: Outline Action Plan

Headline Action	Current Recycling Performance	Likely Impact on Recycling Performance
<b>1. Improve Material Quality, and</b> <b>4. Make use of all available data</b>	Further expand separate glass and other materials Oct/Nov 2022.	Medium
	Targeted education and enforcement programme to reduce garden waste contamination and increase recycling (links with 4.1, 4.2, 4.3 of Table 1). For example, the Pink Sticker Campaign/ Student Food Recycling Campaign/Be Mighty Recycle Campaign.	Medium
<b>2. Increase Recycling Participation and Capture</b>	<b>Implement immediate and medium-term improvements to Trade to focus on recycling performance:</b> - Reviewing all residual only contracts and only retain customers who sign up to recycling (implemented) - Cease provision of one-off mixed skips – all waste must be segregated into recyclable materials (implemented) - Implement 'One Pass' vehicle to collect three separate streams and comply with Business Waste Regulations. - Reinvigorate the Schools 'Really Rubbish' Campaign, linking with Trade to promote recycling services and composting in Schools.	High
	Review residual waste provision and introduce measures to increase participation in food waste service.	High
<b>3. Increase opportunities to Recycle</b>	Increase range of materials and opportunities to recycle (e.g. AHP, Tetra packs, coffee pods, SDA recycling facilities at hubs/pop up recycling centres)	Medium
	Recently introduced 2 new vehicles to our cleansing fleet that have a split back, to enable the separate collection of recycling from community litter picks. We will continue to build on this to increase more cleansing and enforcement waste.	Low
<b>6. Encourage and support the prevention, reuse and repair of materials</b>	Supporting Reuse and repair activities, in line with the circular economy vision: Working with Benthyc Cymru/Repair Café Wales; Introducing Reuse facility at Lamby Way HWRC; develop business case for re-use / repair superstore; Working with CLARE Wales to build a Repair Directory	Low

Version 1

# City of Cardiff Council Waste Compositional Analysis



Waste composition analysis of kerbside collected and communally collected household waste in Cardiff

**Project code:** 5130

**Research date:** April 2021

**Date:** September 2021

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Our mission is to accelerate the move to a sustainable resource-efficient economy through re-inventing how we design, produce and sell products; re-thinking how we use and consume products; and re-defining what is possible through re-use and recycling.

Find out more at [www.wrapcymru.org.uk](http://www.wrapcymru.org.uk)

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**Written by** Olivia Sweeney & Coralline Dundon



**Front cover photography:** [Mixed Dry Recycling in Wales]

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# Executive summary

Resource Futures conducted a composition analysis of residual waste, recycling, and food for WRAP Cymru Collaborative Change Programme (CCP) and City of Cardiff Council in April 2021. Waste was collected for analysis from a representative sample of properties receiving kerbside waste collections and from a representative sample of properties receiving communal waste collections (flats).

The aim of the composition analysis is to better understand recycling performance in Cardiff, including comparing the performance of properties receiving both service types. The analysis will determine the proportion of residual waste which could have been recycled using existing services.

Using Output Area Classification (OAC), Resource Futures selected two samples:

- A sample of 210 kerbside households, proportionally stratified so that each demographic group was represented according to the same proportions as the wider Cardiff area. The sample included some of the same households included in the 2015 analysis. Waste samples were collected by Resource Futures.
- A sample of 201 properties receiving a communal waste service was selected to reflect their demographic profile across Cardiff. Waste samples were collected by Cardiff Council under Resource Futures supervision.

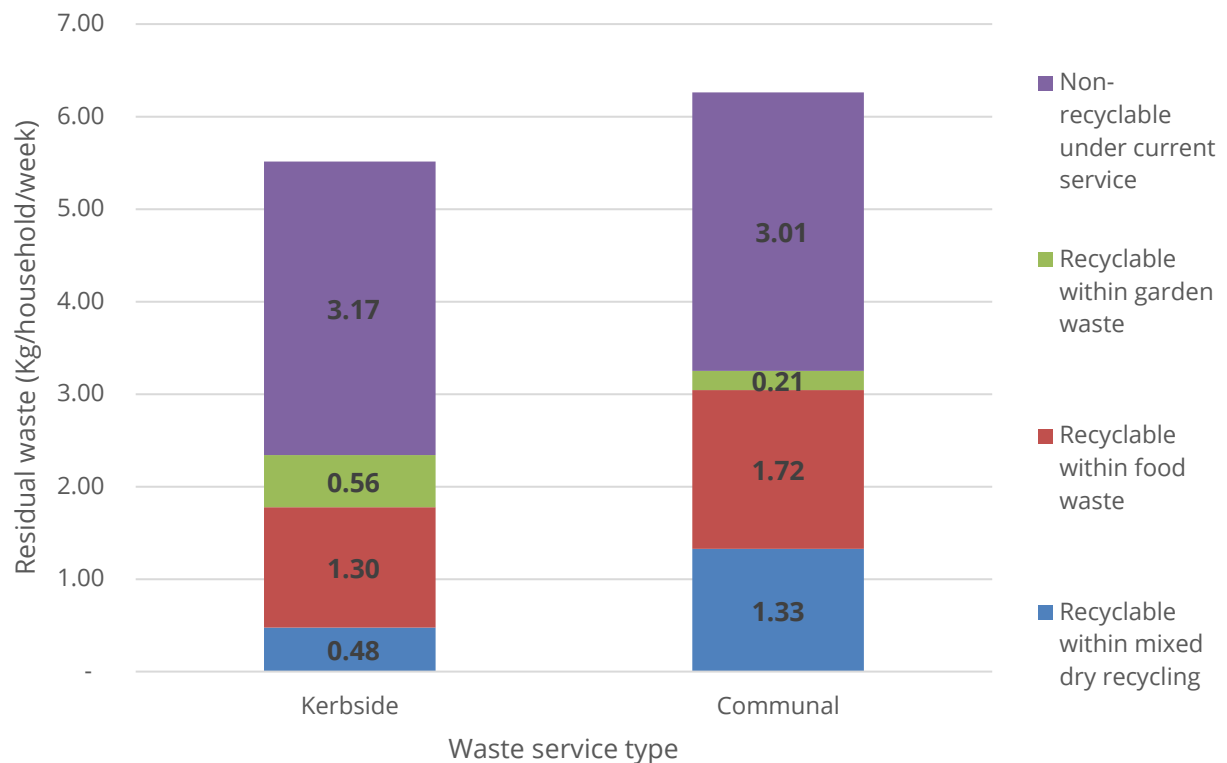
The fieldwork was undertaken at an industrial unit in Cardiff rented by WRAP, where a team of experienced Resource Futures staff analysed the samples of waste to the agreed category list (see Appendix 1). In total 9,803 kilograms of waste was collected and analysed over four weeks of fieldwork, including 4,752 kg residual waste, 3,768 kg dry recycling and 1,263 kg of separately collected food waste.

The overall arising of waste across all waste streams combined from the average household receiving a communal waste service was lower than from the average property receiving a kerbside waste service – 10.91 kg/hh/week and 13.32 kg/hh/week respectively. However, there were clear differences in waste and recycling performance between the properties receiving a kerbside collection service and those receiving a communal collection service, as outlined below.

## *Residual waste*

- A higher amount of residual waste was produced by communal properties (6.26 kg/hh/wk) than properties receiving a kerbside service (5.51 kg/hh/wk). Communal properties residual waste contained a higher proportion of material targeted by the mixed dry recycling, food waste and garden waste collections (51.9% or 3.26 kg/hh/wk) than residual waste collected from the kerbside (42.5% or 2.34 kg/hh/wk), as shown in the figure overleaf.
- Despite the provision of food waste and garden waste services to all households included in the study, the proportion of putrescible waste within all samples analysed remained high for both services. Putrescible waste made up the largest proportion of the residual waste by weight – 39.4% or 2.17 kg/hh/wk at the kerbside and 35.0% or 2.19 kg/hh/wk for properties receiving a communal service. In both cases the most common kerbside recyclable material found was food waste.

- On average 21.2%, or 1.33 kg/hh/wk of the material within the communal residual waste was targeted by the mixed dry recycling collection. At the kerbside, a lower 8.7% of residual waste analysed, or 0.48 kg/hh/wk, was targeted by the mixed dry recycling collection and could have been recycled.



#### Mixed dry recycling

- Communal properties produced a lower arising of dry recycling (4.1kg/hh/wk) compared to kerbside properties (5.11kg/hh/wk).
- Materials targeted by the mixed dry recycling service were very well captured overall at the kerbside (89%), but less so when collected communal (64%).
- Higher contamination was found within the dry recycling stream for communal serviced properties (41.4%, 1.69 kg/hh/wk), compared to 23.7% (1.21 kg/hh/wk) for kerbside properties.

#### Food waste

- At the kerbside the arising of separately collected food waste was 2.67 kg/hh/wk. Separately collected food waste arisings were significantly lower for communal properties, just 0.55 kg/hh/wk.
- Communal properties had a much lower capture rate for food waste - 19% compared to 62% for kerbside properties.
- Looking across all waste streams, kerbside properties produced more food waste than those receiving a communal service – 4.2 kg/hh/wk and 2.74 kg/hh/wk respectively.

The overall picture shows that communal properties are performing to a much lower recycling standard than kerbside properties.

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# Acknowledgements

We would like to thank City of Cardiff Council for their assistance in delivering this project.



## 1.0 Introduction

Resource Futures was commissioned by the WRAP Cymru CCP team to conduct a waste composition analysis of kerbside collected and communally collected waste for City of Cardiff Council (Cardiff Council). The analysis included residual waste, dry recycling and food waste, and was undertaken over the full collection cycle. The kerbside collected waste compositional analysis took place from 23<sup>rd</sup> -March to 3<sup>rd</sup> April 2021. The communal properties waste compositional analysis took place from 6<sup>th</sup> April to 16<sup>th</sup> April 2021. This report presents the results of both analyses.

### 1.1 Recycling Service

#### 1.1.1 Kerbside Collection

Cardiff Council provides a comprehensive kerbside collection service to its residents using a mixture of containers and bags for different materials.

Dry recycling is collected from residents weekly using green single use plastic bags. Materials accepted in the green recycling bag include:

- Recyclable paper,
- Recyclable card,
- Plastic bottles, pots, tubs and trays, and,
- Tins, cans, empty aerosols and clean foil.

Glass is usually collected in a blue bin, but residents had temporarily been instructed to include glass in the green bags. This was due to COVID 19 impacting staffing levels, and consequently the collection service in Cardiff.

Food waste is collected weekly using an outdoor caddy.

Residual waste is collected fortnightly in either red striped bags or 140L black wheelie bins, which must have the lid closed to be collected. An optional fortnightly service for absorbent hygiene products waste is also available to residents on the opposite week to the residual week. Hygiene products are accepted within the normal residual waste too.

An optional garden waste service is offered by Cardiff Council. The service does not operate in the winter months and garden waste containers (240 L green wheel bins or white sacks) are chargeable.

A full list of materials and items accepted for recycling within each stream is given in Appendix 1.

#### 1.1.2 Communal Properties Collection

Residents living in flats in Cardiff are provided with a very similar service to that offered to kerbside properties, with additional communal containment.

Dry recycling is collected from residents weekly, green bags are provided to households, and these must be placed in the communal green bin (660L-1100L). Food waste is also collected weekly. Caddy liners are provided to households and food waste is placed in communal brown 240L food waste bin for collection. Garden Waste collections are provided to

communal properties with gardens – garden waste must be placed unbagged into green 240L wheeled bins provided.

An optional service for hygiene products is offered to be collected in yellow bags, this is a fortnightly service, on the opposite week to residual collection. Hygiene products are accepted within the normal residual waste too.

A full list of materials and items accepted for recycling within each stream is given in Appendix 1.

## 1.2 Project Objectives

The aim of the composition analysis is to better understand recycling performance in Cardiff, particularly the difference in performance between the kerbside collected and communally collected waste services. The analysis will determine the proportion of residual waste which could have been recycled using existing services.

## 2.0 Methodology

### 2.1 Sample stratification and design

Output Area Classification (OAC) demographic system from the Office of National Statistics (ONS) was used to create a demographic profile of Vale of Glamorgan population, which was used to stratify the sample. This was the same methodology as used in the Welsh National composition analysis study in 2015.

The OAC data was combined with accommodation type data based on the 2011 Census available for the ONS to determine the profile of communal properties in Wales. Data was matched by Output Area. The data suggested that flats account for 26% of households in Cardiff.

The demographic profile of all properties in Cardiff is shown in the table below, as well as the demographic profile of flats in Cardiff.

Table 1: OAC Demographic profile for Cardiff Council - kerbside properties & flats

OAC Super group	OAC Supergroup title	Demographic profile (All housing types)	Demographic profile (Flats only)
1	Rural Residents	0.1%	0.0%
2	Cosmopolitans	15.0%	34.3%
3	Ethnicity central	4.7%	13.3%
4	Multicultural metropolitans	14.7%	11.7%
5	Urbanites	23.3%	19.6%
6	Suburbanites	19.5%	2.6%
7	Constrained City Dwellers	8.2%	13.6%
8	Hard pressed living	14.5%	5.0%
<b>Total</b>		<b>100.0%</b>	<b>100.0%</b>

### 2.1.1 Kerbside collected waste sample

Collection round data was provided by Cardiff Council. Individual postcodes were then profiled by OAC Supergroup to allow for selection of appropriate streets and houses for inclusion in the study.

A demographically representative sample of 210 household was selected, including some of the properties used during the Welsh National composition analysis study in 2015 to maximise comparability. The household sample was proportionally stratified so the proportion of households in each OAC supergroup stratum is the same as the overall authority profile.

The target number of households selected within each OAC group is shown in section 3.1.

Resource Futures created a detailed sample plan and paperwork identifying which households should be included in the overall sample frame.

### 2.1.2 Communal collected waste

Collection round data was provided by Cardiff Council and used to create a list of suitable communal properties which could be included in the study. Appropriate properties with communal waste arrangements were chosen based on OAC group. Care was taken to identify properties where waste could be clearly attributed to the correct number of households to enable accurate arising calculations. The type of communal properties was not considered (i.e., private vs social vs sheltered accommodation). A demographically representative sample of communal properties totalling 200 households was selected. The sample was non-proportionally stratified and results were weighted to match the overall communal properties profile.

The target number of households selected within each OAC group is shown in section 4.1.

## 2.2 Composition analysis fieldwork

The composition analysis fieldwork took place over 10 days for kerbside properties and 10 days for communal properties, to ensure the full collection cycle was included for each type of service. The fieldwork commenced on 23<sup>rd</sup> March 2021 and ended on 18<sup>th</sup> April 2021. Table 2 below shows the fieldwork schedule.

Table 2: Fieldwork schedule

<b>Week starting</b>	<b>Streams Collected and Sorted</b>	<b>Service Type</b>
23rd March	Residual, dry recycling and food waste	Kerbside
30th March	Recycling and food waste	Kerbside
6th April	Residual, dry recycling and food waste	Communal
13th April	Recycling and food waste	Communal

### 2.2.1 Kerbside sample collection

A Resource Futures site manager, collection vehicle driver and loader collected all waste samples during the fieldwork. The collection team was provided with a detailed daily collection list. The regular collection crews at Cardiff Council were briefed about the work

and were instructed not to visit certain streets each day until the sample collection had been completed. All waste was collected on the regular collection day.

### *2.2.2 Communal sample collection*

Collections of residual waste and mixed dry recycling from communal bins were undertaken by Cardiff Council using an RCV and supervised by a Resource Futures collections supervisor. Food waste was collected by Resource Futures. The collection team was provided with a detailed daily collection list. All waste was collected on the regular collection day.

### *2.2.3 Sorting protocol and waste categorisation*

Once collected, samples were delivered to a rented industrial unit in Cardiff. All collected waste was analysed and categorised into the agreed category list. Weights were obtained for each category of material using digitally calibrated scales. The disposal of sorted waste was arranged by Cardiff Council staff at Lamby Way with material being kept separate for recycling.

## 2.3 Analysis method

The material weights recorded during the composition analysis fieldwork were inputted into tailored MS Excel files, and all data values were quality checked to ensure accuracy. The report focuses on the main category level findings. More detail can be found in the accompanying MS Excel files.

Percentage composition was calculated by weight for each kerbside and communal demographic group level sample. The results from each demographic group were combined proportionally as a weighted average to calculate the overall composition. The average household arisings in kilograms per household per week (kg/hh/wk) were calculated for each material category by demographic group and as a whole.

The proportion of material in the residual waste which could be recycled at the kerbside was calculated, as well as the contamination levels of the recycling streams, according to the Cardiff Council material acceptance policies for each material stream. Nappy waste has not been included as recycling in the analysis as this waste stream is not currently sent for recycling.

### *2.3.1 Capture rates*

Capture rates is defined as how much targeted recyclable material is found in the recycling as opposed to the residual (%). For example, if we measured 10kg of newspaper in the residual waste and 90kg in the recycling, this would result in a 90% capture rate.

### *2.3.2 Extended Producer Responsibility and Deposit Return Scheme*

Future legislation such as Extended Producer Responsibility (EPR) and Deposit Return Scheme (DRS) is currently under consultation and is likely to come into play in the next few years, with potentially significant impact for local authority services.

There are currently two options being considered for the implementation of DRS: 'All In' – included items such as glass, plastic and metal beverage containers of all sizes

'On the Go' which only includes single (<750ml) size plastic, metal and glass beverage containers.

There are immediate and future plans for EPR schemes. The imminent proposal includes packaging waste. The future scheme could cover items such as textiles and building waste.

The material analysed was classified in a way which allowed an estimation of the potential impact of these schemes to be calculated. Full details of materials included in these schemes can be found in Appendix 2.

Please note that figures are accurate to one decimal point and where the table or chart sums do not add to 100% this is due to rounding in MS Excel.

### 3.0 Kerbside waste results

In total 5,574 kilograms of waste was collected from 210 kerbside households over 10 days, including 2,316 kg residual waste (of which 42kg was separately collected nappy and hygiene waste) 2,138 kg mixed dry recycling and 1,120 kg food waste.

#### 3.1 Sample achieved

All collections were undertaken as planned, including waste from 210 households in the desired proportions.

#### 3.2 Set out rates

The set out for week one and week two for each waste stream included in the analysis is shown in Table 3 below.

Table 3: Set out rates

Set out rate	Residual waste	Recycling	Food waste
Week 1	100.0%	94.8%	72.9%
Week 2	N/A	86.5%	71.9%

As shown in the table above there is variation in usage of both recycling service and food waste service between the first and second week of the collection cycle. Although the participation remained high, the recycling and food waste service was slightly less well used in the second week of the collection cycle.

#### 3.3 Composition and arisings of kerbside collected residual waste

The average kerbside household residual waste arising was 5.51 kg/household/week.

Full detailed findings at demographic group and sub-category level are shown in the accompanying MS Excel files.

The composition and arisings from the analysis are shown in Table 4 and Figure 3.

Table 4: Residual waste composition by percentage weight and arisings in kg/hh/wk

Material category	Composition (%)	Arisings (Kg/HH/wk)
Number of households in sample	<b>210</b>	
1. Paper and Card	9.6%	0.53
2. Plastic Film	6.9%	0.38
3. Dense Plastic	4.7%	0.26
4. Textiles	6.6%	0.36
5. Other Combustible	17.6%	0.97
6. Other Non-Combustible	4.8%	0.27
7. Glass	3.1%	0.17
8. Putrescibles	39.4%	2.17
9. Ferrous Metal	1.7%	0.09
10. Non-Ferrous Metal	1.0%	0.06
11. WEEE	2.0%	0.11
12. Potentially Hazardous	0.9%	0.05
13. Fines	1.6%	0.09
14. Council Issued Sacks	0.1%	0.00
<b>Total</b>	<b>100.0%</b>	<b>5.51</b>

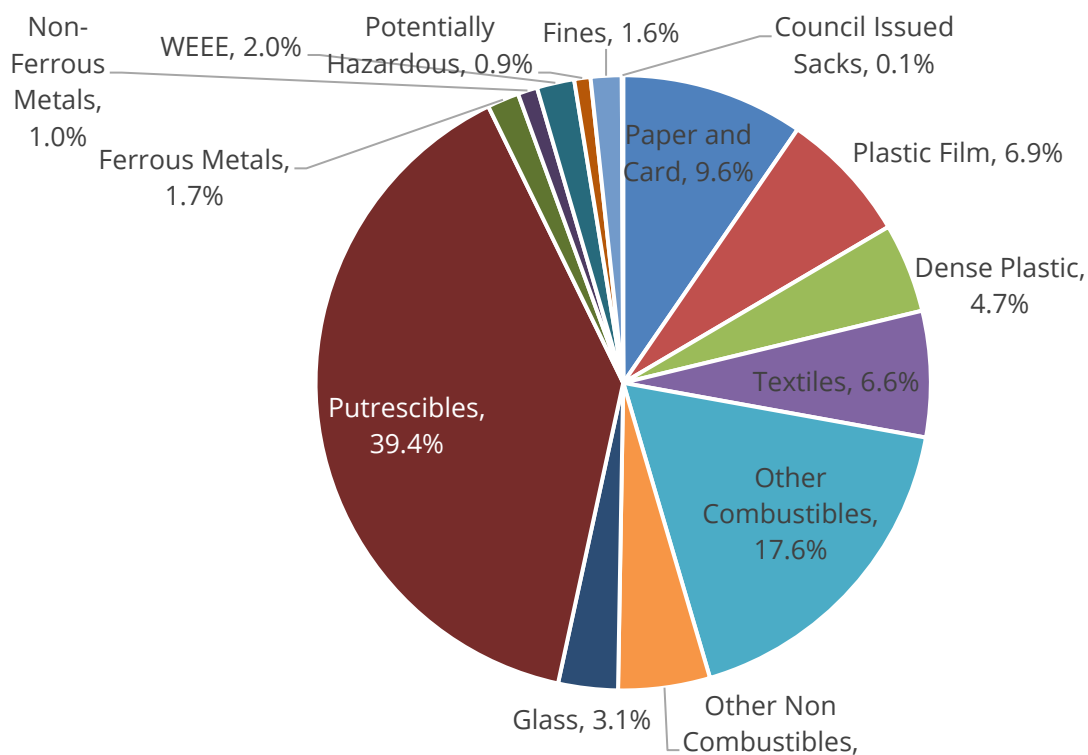


Figure 1: Residual waste composition in Cardiff kerbside properties (%)

Putrescible waste made up the largest proportion of the residual waste by weight, 39.4% of residual waste analysed or 2.17 kg/hh/wk. The majority of this material was food waste

(23.6%, 1.30 kg/hh/wk), of which 16.1% was classified as edible, 1.8% as potentially edible and 5.6% as inedible. Cooking fats and liquids found within food and drink containers accounted for 1% of residual waste and other organic material (mainly pet excrement) accounted for 4.6% of residual waste. Garden waste and soil accounted for 3.8% and 6.4% respectively.

Other combustible materials accounted for 17.6% and included items such as nappies (5.4%), other absorbent hygiene products (2.4%) as well as wood and cork (3.6%).

Paper and card accounted for 9.6% (0.53 kg/hh/wk) of residual waste analysed. While the majority of the material was tissues, paper towels and kitchen roll (4.6%), 3.7% could have been recycled at the kerbside had it been placed in the correct container by residents.

The total proportion of material by percentage weight which could have been recycled using the existing kerbside services (mixed dry recycling, food waste and garden waste collections) was 42.5%. The average weekly household arisings of kerbside recyclable material in the residual stream was 2.34 kg/hh/wk.

The overall proportion and arising of kerbside recyclable materials found within the kerbside residual waste stream are shown in Table 5 and Figure 4.

Table 5: Arising of material targeted by existing recycling service within residual waste

<b>Composition of residual waste</b>	<b>Composition (%)</b>	<b>Arisings (Kg/HH/wk)</b>
Dry Recycling	8.7%	0.48
Food Waste	23.6%	1.30
Garden Waste	10.2%	0.56
Non-recyclable at the kerbside	57.5%	3.17
<b>Total</b>	<b>100.0%</b>	<b>5.51</b>

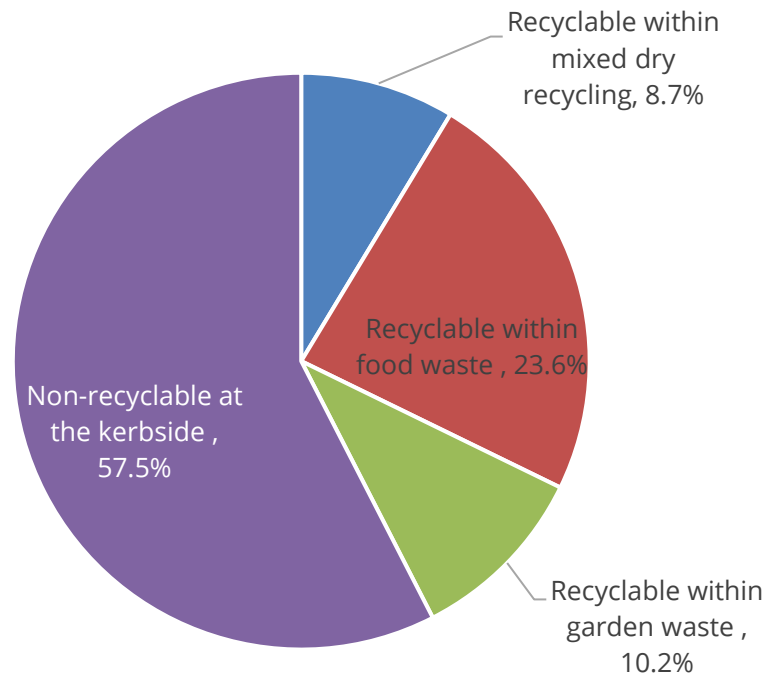


Figure 2: Recyclable material within residual waste

### 3.3.1 Absorbent Hygiene Product Waste

Cardiff Council offers residents a kerbside collection for absorbent hygiene products (AHP) waste on the second week of the collection cycle to allow residents to dispose of these materials weekly. The material was separately collected and analysed on the second week of the analysis to quantify its arising. As the AHP waste is not currently sent for recycling, it has been included within the residual figures in Table 4 above.

The arising of separately collection AHP waste in the Cardiff Council area was 0.20kg/hh/wk, of which the majority was nappies, 0.16 kg/hh/wk. It should be noted that this service was only used by residents in OAC 6, 7 and 8.

### 3.3.2 Other potentially recyclable material

A number of materials with recycling potential but not currently recyclable within the kerbside recycling service were also found within the residual waste. Overall, 7.3% of residual waste analysed (including textiles and WEEE) was recyclable through other routes.

Recyclable textiles, which include clothing, shoes, bags and household linens made up 5.3 % or 0.29 kg/hh/wk. This material could have been recycled either at the HWRC or through other textile recycling or reuse options such as textile banks, charity shops and door to door charity collections.

WEEE across all categories account for 2.0% of residual waste or 0.11 kg/hh/wk, should not be disposed of within the residual waste stream and could have been recycled at the HWRCs.

### 3.3.3 Estimated impact of future legislation



Future legislation such as Extended Producer Responsibility (EPR) and Deposit Return Scheme (DRS) is currently under consultation and is likely to come into play in the next few years, with potentially significant impact for local authority services.

There are currently two options being considered for the implementation of DRS:

- 'All In' – included items such as glass, plastic and metal beverage containers of all sizes
- 'On the Go' which only includes single (<750ml) size plastic, metal and glass beverage containers.

There are immediate and future plans for EPR schemes. The imminent proposal includes packaging waste. The future scheme could cover items such as textiles and building waste.

Table 6 below summarises the potential impact of these schemes.

Table 6: Summary of potential impact of EPR and DRS schemes on residual waste

<b>Composition of residual waste</b>	<b>Composition (%)</b>	<b>Arisings (Kg/HH/wk)</b>
Materials potentially impacted by EPR (packaging)	14.2%	0.78
Materials potentially impacted by EPR long term (Textiles & building materials)	11.7%	0.64
Materials potentially impacted by 'All in' DRS scheme	1.3%	0.07
Materials potentially impacted by 'On-the-go' DRS scheme	0.8%	0.04

The table above shows that up to 1.3% of residual waste could fall within the proposed DRS scheme – 1.3% for the 'All in' scheme or 0.8% for the 'on the go' scheme.

The table above shows that 14.2% of the residual waste is packaging and could be impacted by the packaging EPR scheme. The future, broader scheme could potentially apply to a further 11.7% of the residual stream.

### 3.4 Composition and arisings of kerbside collected recycling

The composition findings and arising calculations from the analysis are shown in Table 7 and Figure 5

Table 7: Recycling waste composition by percentage weight and arisings in kg/hh/wk

<b>Material category</b>	<b>Composition (%)</b>	<b>Arisings (Kg/HH/wk)</b>
Number of households in sample	<b>210</b>	
1. Paper and Card	37.2%	1.90
2. Plastic Film	3.5%	0.18
3. Dense Plastic	13.7%	0.70
4. Textiles	0.8%	0.04
5. Other Combustible	3.3%	0.17
6. Other Non-Combustible	0.5%	0.03
7. Glass	27.6%	1.41
8. Putrescibles	5.0%	0.26
9. Ferrous Metal	3.3%	0.17
10. Non-Ferrous Metal	3.2%	0.16
11. WEEE	0.2%	0.01
12. Potentially Hazardous	0.3%	0.02
13. Fines	0.4%	0.02
14. Council Issued Sacks	1.1%	0.05
<b>Total</b>	<b>100.0%</b>	<b>5.11</b>

Paper and card accounted for the highest proportion of the mixed dry recycling analysed, 37.2%, of which 31.6% was recyclable paper and card. Of the remaining 5.6% which was not targeted for recycling, 2.5% was tissues and kitchen roll.

Glass accounted for 27.6% of the mixed dry recycling analysed, of which all but 0.5% was recyclable glass bottles and jars. On average, 21.8% of the recycling analysed was glass beverage containers.

Dense plastic accounted for 13.7% of the mixed dry recycling analysed this included 6.9% plastic bottles, 4.6% plastic pots, tubs and trays (PTTs) and 2.3% other dense plastic items not targeted by the recycling scheme. A further 3.5% of plastic film was also found within the mixed dry recycling.

The overall contamination level of the recycling analysed was significant - 23.7% or 1.21 kg/hh/wk of the material analysed was not targeted by the scheme. As well as the non-recyclable items mentioned above, the contamination included 4.0% solid food waste and 4.9% liquid food and drink waste.

Full detailed findings at demographic group and sub-category level are shown in the accompanying MS Excel files.

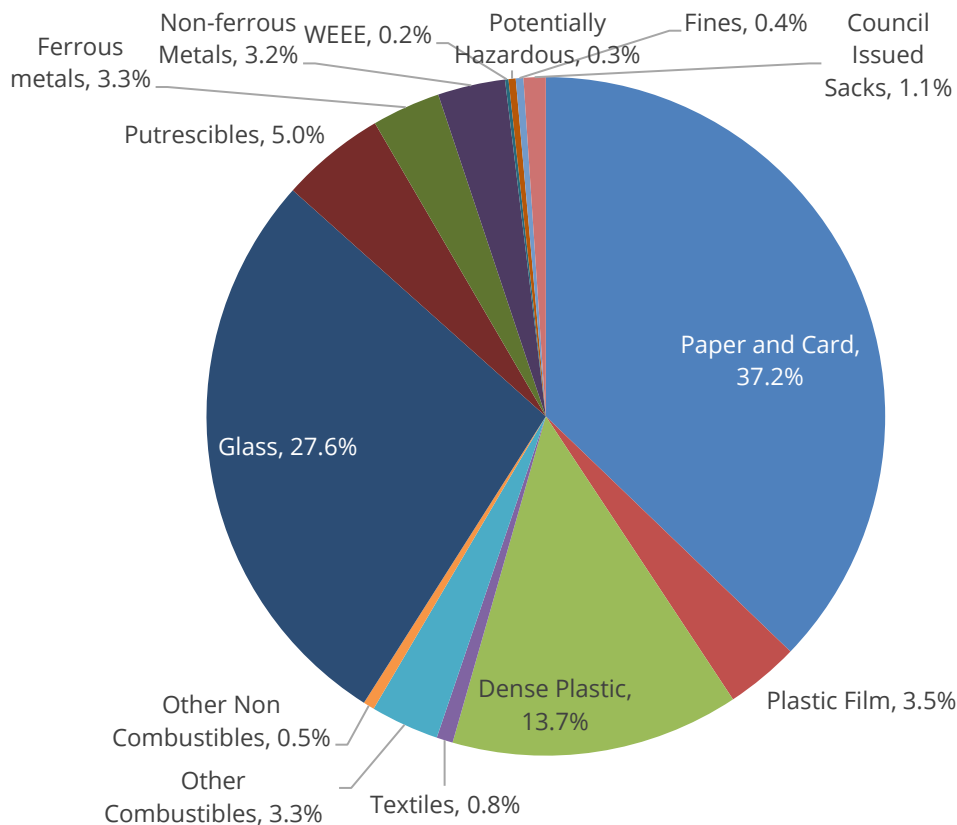


Figure 3: Recycling composition by percentage weight

### 3.4.1 Estimated impact of future legislation

As mentioned in Section 3.3.3 above, the impact of upcoming EPR and DRS legislation on local authority collected waste has been estimated and is shown in Table 8 below.

Table 8: Summary of potential impact of EPR and DRS schemes on mixed dry recycling

Composition of residual waste	Composition (%)	Arisings (Kg/HH/wk)
Materials potentially impacted by EPR (packaging)	71.6%	3.66
Materials potentially impacted by EPR long term (Textiles & building materials)	1.5%	0.08
Materials potentially impacted by 'All in' DRS scheme	27.1%	1.38
Materials potentially impacted by 'On-the-go' DRS scheme	16.2%	0.83

The table above shows that up to 27.1% of mixed dry recycling could fall within the proposed DRS scheme – 27.1% for the 'All in' scheme or 16.2% for the 'on the go' scheme.

The table above shows that 71.6% of the mixed dry recycling analysed was classified as packaging and could be impacted by the packaging EPR scheme. The future, broader scheme could potentially apply to a further 1.5% of mixed dry recycling.

### 3.5 Composition and arisings of kerbside collected food waste

The composition and arisings of kerbside collected food waste in Cardiff are shown in Table 9 below.

Table 9: Food waste composition by percentage weight and arisings in kg/hh/wk

Material category	Composition (%)	Arisings (Kg/HH/wk)
Number of households in sample	<b>210</b>	
Inedible food waste	43.0%	1.15
Potentially edible food waste	12.3%	0.33
Edible food waste	37.8%	1.01
Cooking fat	0.0%	0.00
Liquids	0.0%	0.00
Other organic	3.0%	0.08
Other putrescibles	0.3%	0.01
Other waste	0.9%	0.02
Fines	2.7%	0.07
<b>Total</b>	<b>100.0%</b>	<b>2.67</b>
Contamination	7%	0.19

On average 93.0% of the food waste analysed was categorised as food waste– inedible food waste accounted for 43.0%, edible food waste accounted for 37.8% and potentially edible food waste accounted for 12.3% of material analysed.

A further 7.0% of the material analysed was not food waste. Other organic matter (mostly pet excrement) was also found within the food waste, as well as a small amount of garden waste (0.3%).

Other materials were found which were probably used to contain the food waste such as kitchen roll and tissues (0.6%), paper and card-based food packaging (0.1%) or carrier bags (0.1%). On average 2.7% of food waste was smaller than 10mm and classified as fines.

### 3.6 Capture rates

The capture rate (see 2.3.1 for description) for materials targeted by the food waste and mixed dry recycling services are shown in Table 10 and Figure 6.

Materials targeted by the dry recycling service were well captured overall, with 89% of items targeted by the service being found within the mixed dry recycling.

Glass was captured in 94% of cases – this included beverage containers, with 97% of recyclable material ending up in the mixed dry recycling and non-beverage glass bottles and jars which were slightly less well captured, 87%.

The overall capture rate for paper and card categories was 89% - corrugated card and food and drink cartons were best captured (94% and 90% respectively), while thin card (for example cereal boxes) was least well captured (84%).

The overall capture rate for metals was 66%. Non-ferrous drink cans were the best captured material (90%), while aluminium foil (which also included foil trays) was poorly captured at just 32%.

Overall, 62% of food waste was captured by the food waste service. Inedible food waste, and potentially edible food waste were all well captured, edible food waste had the lowest capture rate.

Table 10: Capture rates by target material (%)

Category	Subcategory	Capture Rate
Paper and Card	Recyclable paper packaging	85%
	Recyclable paper non-packaging	89%
	Thin card packaging	84%
	Thin card non-packaging	83%
	Corrugated card packaging	94%
	Food and drink cartons	90%
Dense Plastic	Plastic bottles	90%
	Plastic pots, tubs and trays	77%
Glass	Glass beverage containers	97%
	Glass non-beverage bottles and jars	87%
Food Waste	Inedible food waste	78%
	Potentially edible food waste	75%
	Edible food waste	49%
Metals	Ferrous tins	87%
	Ferrous aerosols	66%
	Non-ferrous drinking cans	90%
	Non-Ferrous aerosols	73%
	Aluminium foil	32%
<b>Mixed dry recycling capture rate</b>		<b>89%</b>
<b>Food waste capture rate</b>		<b>62%</b>

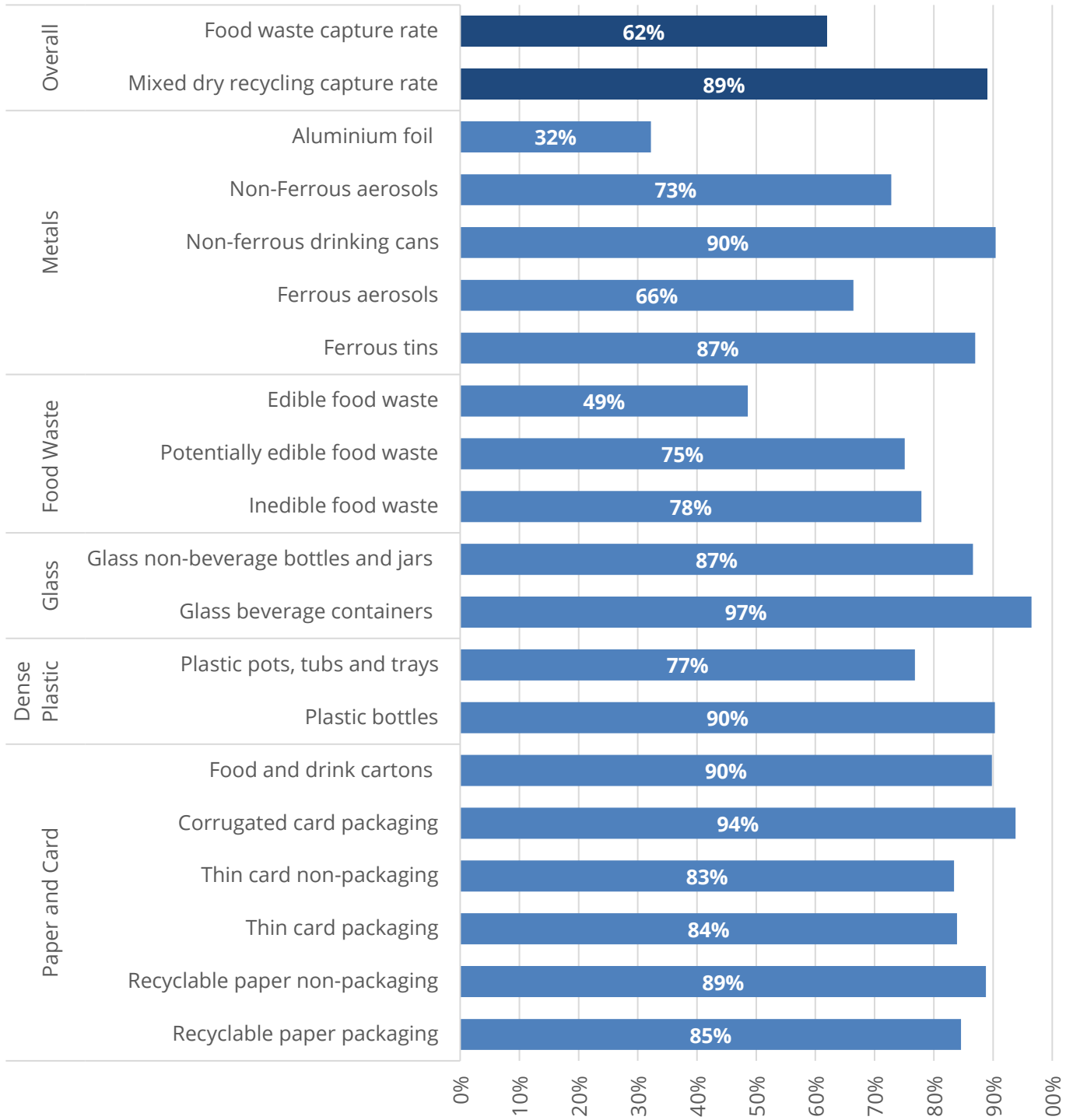


Figure 4: Capture rates of recyclable material (%)

## 4.0 Communal waste results

In total 4,229 kilograms of was collected from 209 communal properties over 10 days, including 2,436kg residual waste, 1,630kg recycling and 163 kg food.

### 4.1 Sample achieved

During collections, the Resource Futures collections supervisor identified that some of the blocks selected for inclusion in the analysis shared their waste containers with other neighbouring properties. Where this was identified, all waste containers were collected, and the number of properties adjusted to ensure that the collected waste came from a known number of households and enable accurate arising calculation.

The above led to some variation in the sample achieved compared to the planned sample, as shown in Table 11 below. As waste from each demographic group was sampled and analysed separately, the results were weighted to ensure they were representative of Cardiff's overall flats population.

Table 11: Sample achieved

OAC Super group	OAC Supergroup title	Target household numbers	Achieved household numbers
1	Rural Residents	0	0
2	Cosmopolitans	48	48
3	Ethnicity central	24	27
4	Multicultural metropolitans	25	42
5	Urbanites	39	39
6	Suburbanites	0	0
7	Constrained City Dwellers	64	53
8	Hard pressed living	0	0
	<b>Total</b>	<b>200</b>	<b>209</b>

### 4.2 Composition and arisings of communal properties residual waste

The composition and arisings of communal properties residual waste in Cardiff are shown in Table 12 and Figure 7 below.

Table 12: Residual waste composition by percentage weight and arisings in kg/hh/wk

Material category	Composition (%)	Arising (kg/hh/wk)
Number of households in sample	<b>209</b>	
1. Paper and Card	13.1%	0.82
2. Plastic Film	4.5%	0.28
3. Dense Plastic	7.1%	0.44
4. Textiles	4.1%	0.26
5. Other Combustible	17.2%	1.08
6. Other Non-Combustible	3.6%	0.22
7. Glass	7.2%	0.45
8. Putrescibles	35.0%	2.19
9. Ferrous Metal	3.1%	0.19
10. Non-Ferrous Metal	1.8%	0.11
11. WEEE	0.6%	0.04
12. Potentially Hazardous	0.6%	0.04
13. Fines	2.0%	0.12
14. Council Issued Sacks	0.2%	0.01
<b>Total</b>	<b>100.0%</b>	<b>6.26</b>

The average communal waste household's residual waste arising was 6.26 kg/household/week.

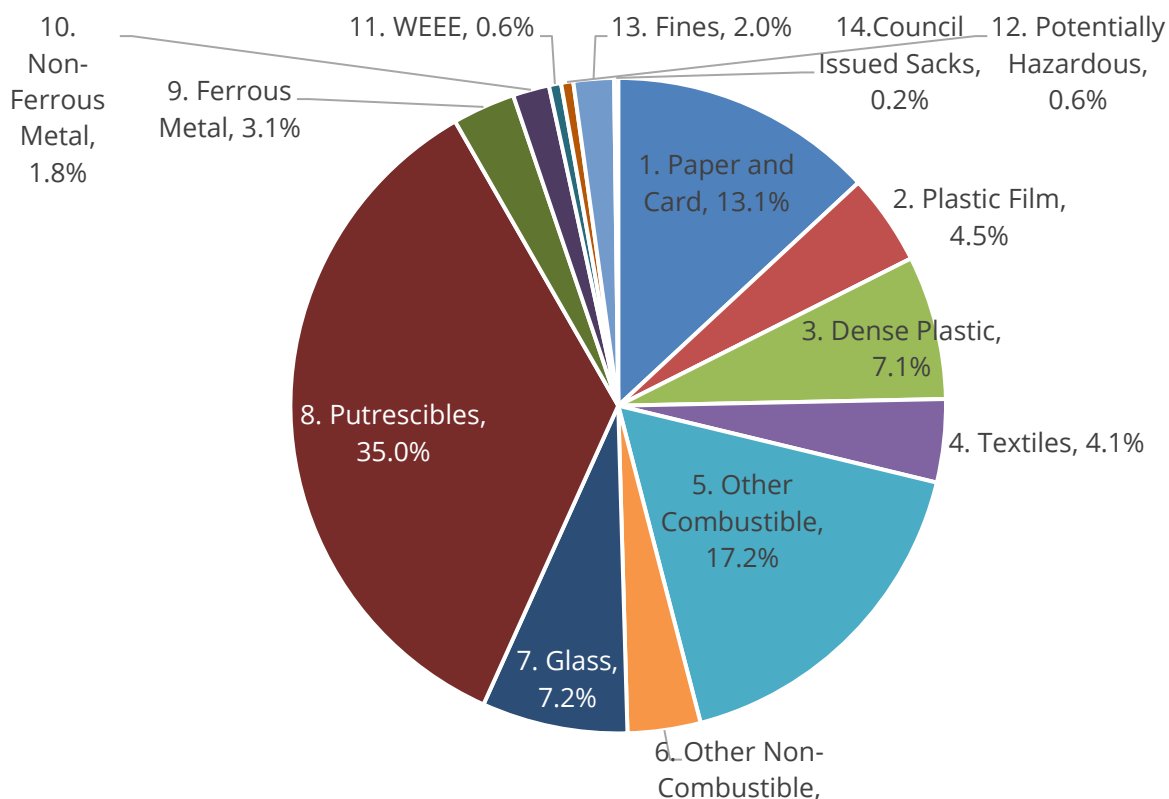


Figure 5: Residual waste composition in Cardiff communal properties (%)



Putrescible waste made up the largest proportion of the residual waste by weight, 35.0% of residual waste analysed or 2.19 kg/hh/wk. The majority of this material was food waste (27.4%, 1.72 kg/hh/wk), of which 18.9% was classified as edible, 1.6% as potentially edible and 7.0% as inedible. Liquids found within food and drink containers accounted for 1.9% of residual waste and other organic material (mainly pet excrement) accounted for 2.4% of residual waste. Garden waste and soil accounted for 1.6% and 1.7% respectively.

Other combustible materials accounted for 17.2% and was mainly composed of carpet and underlay (6.7%). The vast majority of this carpet was found in a single bin store where it weighed over 100kg. Though this is not typical behaviour and maybe skewing results, it is not uncommon to see bulky items disposed of with communal bins. Other combustible materials also included items such as nappies (1.7%), other absorbent hygiene products (1.1%) as well as wood and cork (1.7%) and furniture (1.0%).

Paper and card accounted for 13.1% (0.82 kg/hh/wk) of residual waste analysed. While the majority of the material could have been recycled using the existing recycling facilities (7.4%), the category also includes non-recyclable elements such as 3.7% of non-recyclable paper towels and kitchen roll.

The total proportion of material by percentage weight which could have been recycled using the existing kerbside services (communal mixed dry recycling, communal food waste and communal garden waste collections) was 51.9%. The average weekly household arisings of kerbside recyclable material in the residual stream was 3.25 kg/hh/wk.

The overall proportion and arising of communal properties collected recyclable materials within the residual waste stream are shown in Table 13 and Figure 8 below.

Table 13: Arising of material targeted by existing recycling service within residual waste

<b>Composition of residual waste</b>	<b>Composition (%)</b>	<b>Arisings (Kg/HH/wk)</b>
Dry Recycling	21.2%	1.33
Food Waste	27.4%	1.72
Garden Waste	3.3%	0.21
Non-recyclable at the kerbside	48.1%	3.01
<b>Total</b>	<b>100.0%</b>	<b>6.26</b>

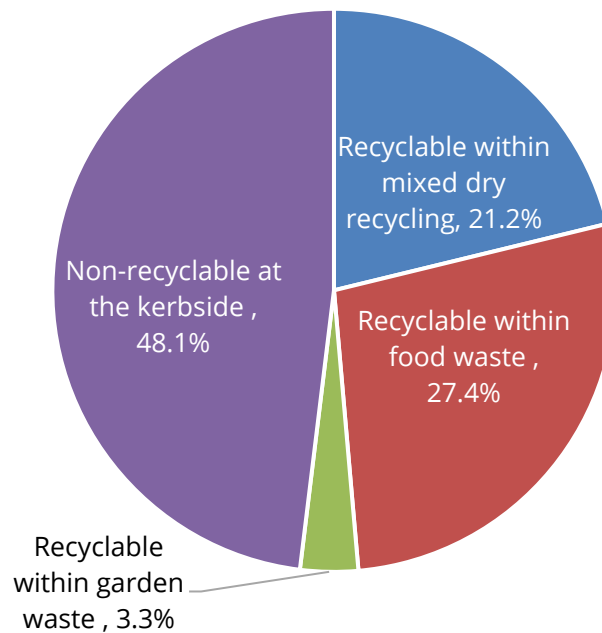


Figure 6: Recyclable material within communal properties residual waste

#### 4.2.1 Other potentially recyclable material

A number of materials with recycling potential but not currently recyclable within the kerbside recycling service were also found within the residual waste. Overall, 2.6% of residual waste analysed (including textiles and WEEE) was recyclable through other routes.

Recyclable textiles, which include clothing, shoes, bags and household linens made up 2.0% or 0.13 kg/hh/wk. This material could have been recycled either at the HWRC or through other textile recycling or reuse options such as textile banks, charity shops and door to door charity collections.

WEEE across all categories accounted for 0.6% of residual waste or 0.03 kg/hh/wk, should not be disposed of within the residual waste stream and could have been recycled at HWRC.

Full detailed findings at demographic group and sub-category level are shown in the accompanying MS Excel files.

#### 4.2.2 Estimated impact of future legislation

Future legislation such as Extended Producer Responsibility (EPR) and Deposit Return Scheme (DRS) is currently under consultation and is likely to come into play in the next few years, with potentially significant impact for local authority services.

There are currently two options being considered for the implementation of DRS:

- 'All In' – included items such as glass, plastic and metal beverage containers of all sizes
- 'On the Go' which only includes single (<750ml) size plastic, metal and glass beverage containers.

There are immediate and future plans for EPR schemes. The imminent proposal includes packaging waste. The future scheme could cover items such as textiles and building waste.

Table 14 below summarises the potential impact of these schemes.

Table 14: Summary of potential impact of EPR and DRS schemes on residual waste

<b>Composition of residual waste</b>	<b>Composition (%)</b>	<b>Arisings (Kg/HH/wk)</b>
Materials potentially impacted by EPR (packaging)	25.2%	1.58
Materials potentially impacted by EPR long term (Textiles & building materials)	13.6%	0.85
Materials potentially impacted by 'All in' DRS scheme	6.8%	0.42
Materials potentially impacted by 'On-the-go' DRS scheme	1.6%	0.10

The table above shows that up to 6.8% of residual waste could fall within the proposed DRS scheme – 6.8% for the 'All in' scheme or 1.6% for the 'on the go' scheme.

The table above shows that 25.2% of the residual waste is packaging and could be impacted by the packaging EPR scheme. The future, broader scheme could potentially apply to a further 13.6% of the residual stream.

#### 4.3 Composition and arisings of communal properties recycling

The composition findings and arising calculations from the analysis are shown in Table 15 and Figure 9.

Table 15: Recycling waste composition by percentage weight and arisings in kg/hh/wk

Material category	Percentage composition	Arising kg/hh/wk
Number of households in sample	<b>209</b>	
1. Paper and Card	28.0%	1.15
2. Plastic Film	3.1%	0.13
3. Dense Plastic	11.0%	0.45
4. Textiles	7.1%	0.29
5. Other Combustible	6.0%	0.25
6. Other Non-Combustible	0.9%	0.04
7. Glass	21.4%	0.88
8. Putrescibles	13.4%	0.55
9. Ferrous Metal	3.0%	0.12
10. Non-Ferrous Metal	2.5%	0.10
11. WEEE	1.2%	0.05
12. Potentially Hazardous	0.4%	0.01
13. Fines	1.0%	0.04
14. Council Issued Sacks	1.1%	0.05
<b>Total</b>	<b>100.0%</b>	<b>4.10</b>

The overall contamination level of the recycling analysed was very significant – 41.4% or 1.69 kg/hh/wk of the material analysed was not targeted by the scheme. One of the samples analysed contained 64.8% non-target material, including nearly 25kg of furniture and 48kg of clothing. Though this is not typical behaviour and maybe skewing results, it is not uncommon to see bulky items disposed of with communal bins.

Paper and card accounted for the highest proportion of the mixed dry recycling analysed, 28.0%, of which 24.4% was recyclable paper and card. The remaining 3.6% was not targeted for recycling.

Glass accounted for 21.4% of the mixed dry recycling analysed, of which all but 1.2% was recyclable glass bottles and jars. On average, 15.9% of the recycling analysed was glass beverage containers.

Putrescible waste was a major contaminant of the mixed dry recycling – 13.4%. The contamination included 11.4% solid food waste and 1.0% liquid food and drink waste.

Dense plastic accounted for 11.0% of the mixed dry recycling analysed this included 5.8% plastic bottles, 3.2% plastic pots, tubs and trays (PTTs) and 1.9% other dense plastic items not targeted by the recycling scheme. A further 3.1% of plastic film was also found within the mixed dry recycling.

Full detailed findings at demographic group and sub-category level are shown in the accompanying MS Excel files.

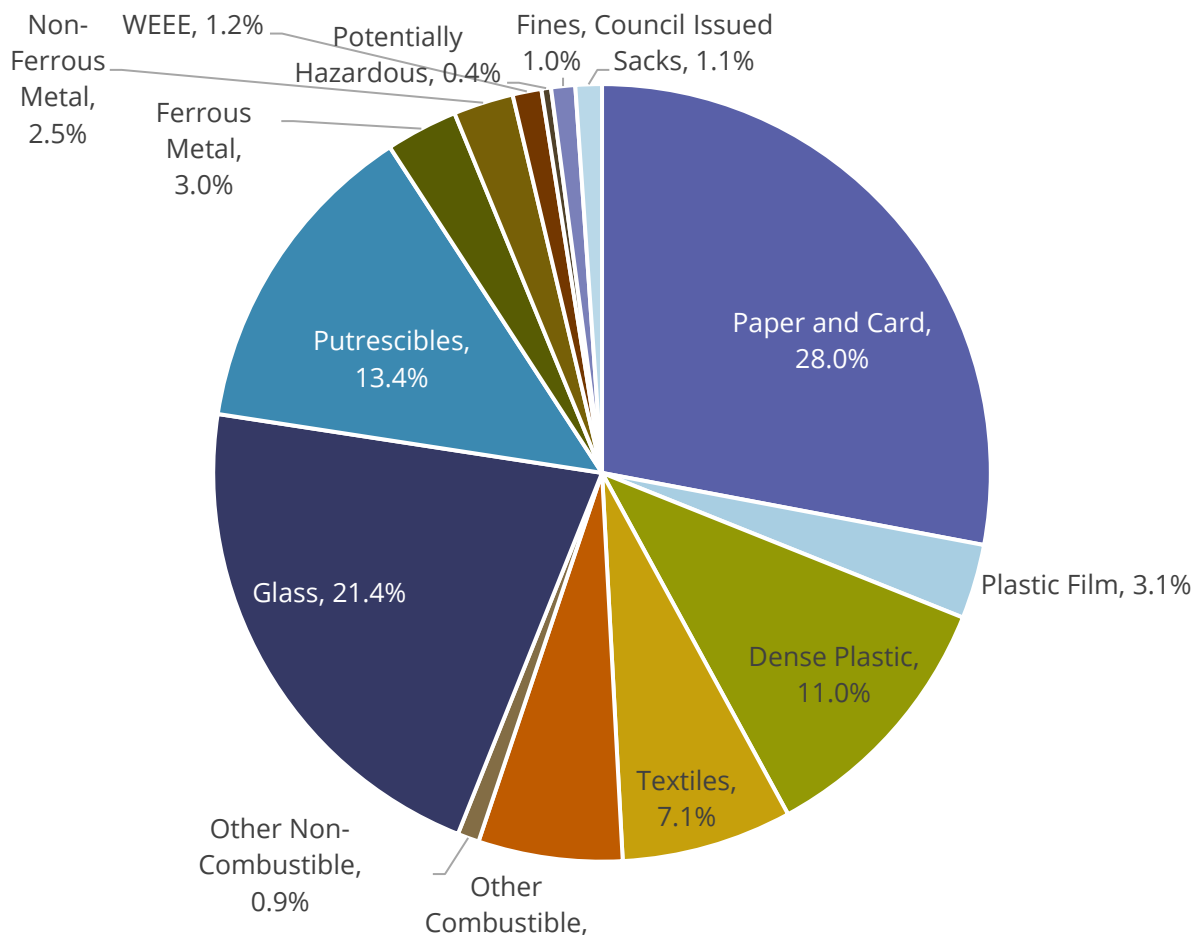


Figure 7: Recycling composition by percentage weight

#### 4.3.1 Estimated impact of future legislation

As mentioned in section 4.2.2 above, the impact of upcoming EPR and DRS legislation on local authority collected waste has been estimated and is shown in Table 16 below.

Table 16: Summary of potential impact of EPR and DRS schemes on mixed dry recycling

Composition of residual waste	Composition (%)	Arisings (Kg/HH/wk)
Materials potentially impacted by EPR (packaging)	56.7%	2.32
Materials potentially impacted by EPR long term (Textiles & building materials)	9.4%	0.39
Materials potentially impacted by 'All in' DRS scheme	20.5%	0.84
Materials potentially impacted by 'On-the-go' DRS scheme	4.3%	0.18

The table above shows that up to 20.5% of mixed dry recycling could fall within the proposed DRS scheme – 20.5% for the 'All in' scheme or 4.3% for the 'on the go' scheme.

The table above shows that 56.7% of the mixed dry recycling analysed was classified as packaging and could be impacted by the packaging EPR scheme. The future, broader scheme could potentially apply to a further 9.4% of mixed dry recycling.

#### 4.4 Composition and arisings of communal properties food waste

The composition findings and arisings calculations from the analysis are shown in Table 17 below.

Table 17: Food waste composition by percentage weight and arisings in kg/hh/wk

Material category	Percentage composition	Arising kg/hh/wk
Number of households in sample	<b>209</b>	
Inedible food waste	43.7%	0.24
Potentially edible food waste	10.7%	0.06
Edible food waste	35.6%	0.20
Cooking fat	0.0%	0.00
Liquids	0.7%	0.00
Other organic	2.6%	0.01
Other putrescibles	0.4%	0.00
Other waste	6.3%	0.04
Fines	0.0%	0.00
<b>Total</b>	<b>100.0%</b>	<b>0.55</b>

On average 90.0% of the food waste analysed was categorised as food waste – inedible food waste accounted for 43.7%, edible food waste accounted for 35.6% and potentially edible food waste accounted for 10.7% of material analysed.

A further 10.0% of the material analysed was not food waste. Other organic matter (mostly pet excrement, 2.6%) was also found within the food waste, as well as a small amount of garden waste (0.4%).

Other materials were found which were probably used to contain the food waste such as kitchen roll and tissues (0.9%), paper and card-based food packaging (0.5%) or carrier bags (0.6%).

#### 4.5 Capture rates

The capture rate (see 2.3.1 for description) for materials targeted by the food waste and mixed dry recycling services are shown in Table 18 and Figure 10.

Materials targeted by the dry recycling service were fairly well captured overall, with 64% of items targeted by the service being found within the mixed dry recycling.

Glass was captured in 67% of cases – this included beverage containers, with 69% of recyclable material ending up in the mixed dry recycling and non-beverage glass bottles and jars which were slightly less well captured, 60%.

The overall capture rate for paper and card categories was 68% - corrugated card and non-packaging thin card were best captured (80% and 78% respectively), while recyclable paper packaging was least well captured (38%).

The overall capture rate for metals was 40%. Non-ferrous drink cans and ferrous tins were the best captured metals (58% and 59% respectively), while aluminium foil (which also included foil trays) was poorly captured at just 19%.

Overall, only 19% of food waste was captured by the food waste service. Inedible food waste was best captured (29%), while edible food waste had the lowest capture rate (12%).

Overall, 18.5% of food waste was captured by the food waste service.

Table 18: Capture rates by target material (%)

Category	Subcategory	Capture Rate
Paper and Card	Recyclable paper packaging	38%
	Recyclable paper non-packaging	70%
	Thin card packaging	59%
	Thin card non-packaging	78%
	Corrugated card packaging	80%
	Food and drink cartons	65%
Dense Plastic	Plastic bottles	63%
	Plastic pots, tubs and trays	50%
Glass	Glass beverage containers	68%
	Glass non-beverage bottles and jars	60%
Food Waste	Inedible food waste	29%
	Potentially edible food waste	31%
	Edible food waste	12%
Metals	Ferrous tins	59%
	Ferrous aerosols	52%
	Non-ferrous drinking cans	58%
	Non-Ferrous aerosols	55%
	Aluminium foil	19%
Overall	<b>Mixed dry recycling capture rate</b>	<b>64%</b>
	<b>Food waste capture rate</b>	<b>19%</b>

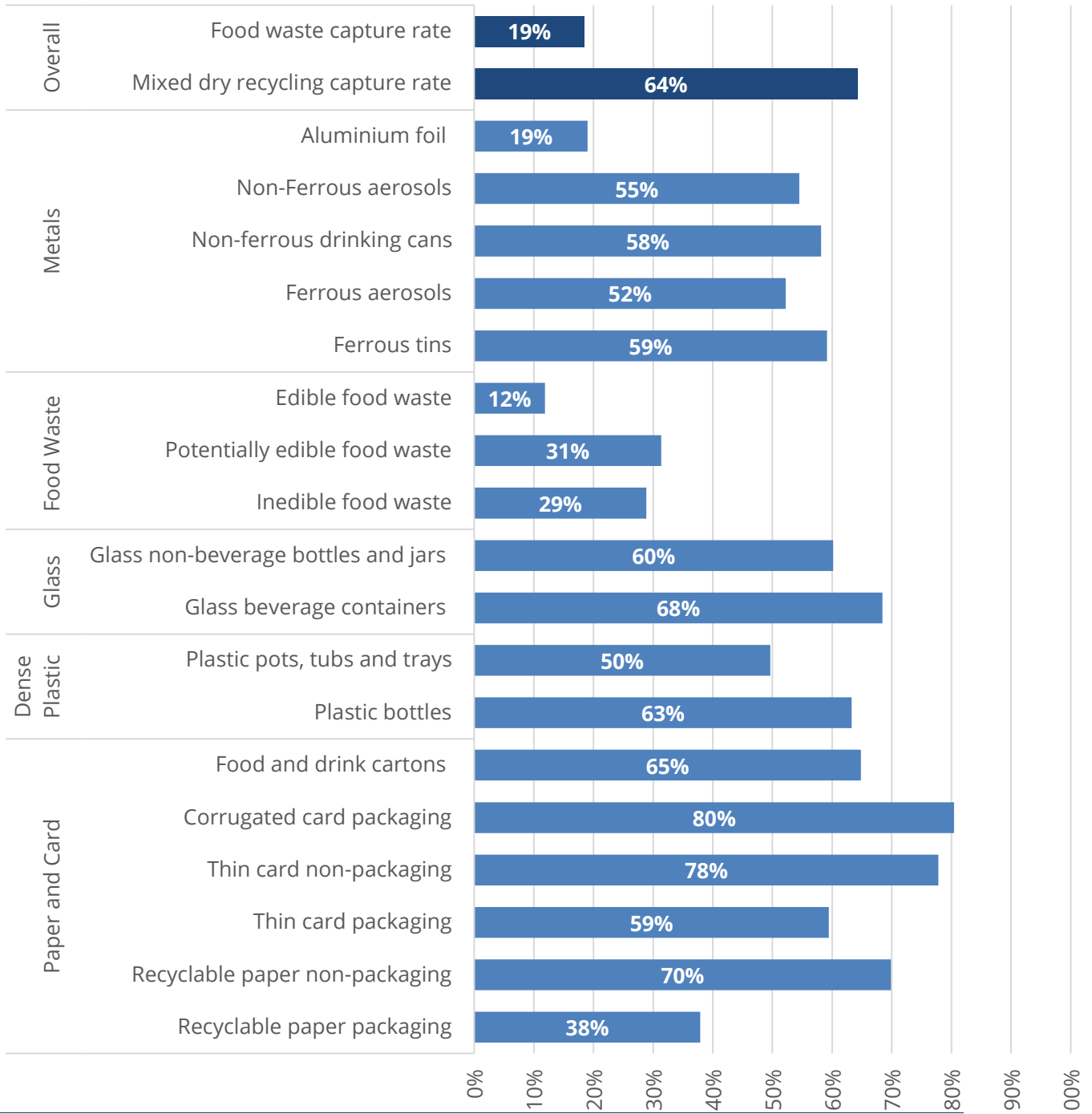


Figure 8: Capture rates by target material (%)



## 6.0 Conclusion

The overall arising of waste from the average household receiving a communal waste service was lower than the average property receiving a kerbside waste service – 10.91 kg/hh/week and 13.32 kg/hh/week respectively. However, there were clear differences in waste and recycling performance between the properties receiving a kerbside collection service and those receiving a communal collection service.

A higher amount of residual waste was produced by communal properties (6.26 kg/hh/wk) than properties receiving a kerbside service (5.51 kg/hh/wk). Communal properties residual waste contained a higher proportion of material targeted by the mixed dry recycling, food waste and garden waste collections (51.9% or 3.26 kg/hh/wk) than residual waste collected from the kerbside (42.5% or 2.34 kg/hh/wk). Encouraging residents to take full use of the services provided may improve recycling and food waste performance.

Despite the provision of food waste and garden waste services to all households included in the study, the proportion of putrescible waste within all samples analysed remained high for both services. Putrescible waste made up the largest proportion of the residual waste by weight – 39.4% or 2.17 kg/hh/wk at the kerbside and 35.0% or 2.19 kg/hh/wk for properties receiving a communal service. In both cases the most common kerbside recyclable material found was food waste. The arising of food waste present within the residual waste indicates was 1.30 kg/hh/wk at the kerbside and 1.72 kg/hh/wk for communal properties. The proportion of residual waste which could have been recycled by the garden waste service provided was 3.3% or 0.21 kg/hh/wk for communal properties and 10.2% or 0.56 kg/hh/wk at the kerbside.

Overall, 21.2%, or 1.33 kg/hh/wk of the material within the communal residual was targeted by the mixed dry recycling collection. At the kerbside, a lower 8.7% of residual waste analysed, or 0.48 kg/hh/wk, was targeted by the mixed dry recycling collection and could have been recycled. Within the kerbside residual waste, the main recyclable materials were thin card (1.5%), recyclable paper (also 1.5%), plastic pots tubs and trays (1.3%), glass jars (0.8%) and aluminium foil (0.7%). Recyclable paper and card categories accounted for 7.4% of communal residual waste and could have been recycled had it been placed in the correct container. Plastic bottles accounted for 2.2% and plastic pots tubs and trays for 2.1%, while glass beverage containers accounted for 4.8% and glass jars for 1.8%. Metal tins, cans, aerosols and foil accounted for 2.8% of communal residual waste composition.

Materials which were potentially recyclable through other routes, such as textiles or WEEE were also found within the residual waste analysed. They accounted for 0.40 kg/hh/wk within kerbside residual waste and for 0.16 kg/hh/wk within the communal residual waste.

Communal properties produced a lower arising of dry recycling (4.1kg/hh/wk) compared to kerbside properties (5.11kg/hh/wk). Materials targeted by the mixed dry recycling service were very well captured overall at the kerbside (89%), but less so when collected communally (64%). Higher contamination was found within the dry recycling stream for communal properties (41.4%, 1.69 kg/hh/wk), compared to 23.7% (1.21 kg/hh/wk) for kerbside properties.

In communal bins, putrescible waste was a major contaminant of the mixed dry recycling – 13.4%. The contamination included 11.4% solid food waste and 1.0% liquid food and drink waste. Anecdotal evidence from the fieldwork team also suggested that there may be some confusion among residents in flats about the correct procedure for recycling food. There

were several occasions where compostable bags full of separate food waste and whole packaged food items were found within the communal mixed dry recycling bins. A further 7.1% was textiles (including 4.6% clothing), and 6.7% other combustible material, which included bulky items such as rolls of carpets and furniture which do not tend to be found within kerbside residual waste, mainly because they do not easily fit in an individual wheeled bin. The dry recycling contamination of communal bins also included 3.6% non-recyclable paper and card, 3.1% plastic film (excluding council issues recycling sacks) and 1.9% other plastic items not targeted for recycling.

Within kerbside dry recycling, 4.0% of the contamination was food waste which could have been recycled at the kerbside had it been placed in the correct container. The dry recycling contamination of kerbside bins also included 5.6% non-recyclable paper and card, 3.5% plastic film (excluding council issued recycling sacks) and 2.3% other plastic items not targeted for recycling.

Looking across all waste streams, kerbside properties produced more food waste than those receiving a communal service – 4.2 kg/hh/wk and 2.74 kg/hh/wk respectively. Communal properties had a much lower capture rate for food waste - 19% compared to 62% for kerbside properties. Inedible food waste was best captured but edible food waste was most poorly captured. This suggests that residents who do not participate in food waste recycling are more likely to manage their food poorly and dispose of packaged food. Most of the waste found in the food waste stream at both kerbside and communal properties was target material, 93% and 90% respectively

At the kerbside the arising of separately collected food waste was 2.67 kg/hh/wk. Separately collected food waste arisings were significantly lower for communal properties, just 0.55 kg/hh/wk. Food waste was also found as a contaminant within the mixed dry recycling, where it accounted for 0.20 kg/hh/wk at the kerbside and 0.47 kg/hh/wk for properties receiving a communal service.

The overall picture shows that communal properties are performing to a much lower recycling standard than kerbside properties. This suggests that the anonymity of communal waste services, as well as the difficulties with moving waste from properties to bin storage, and understanding the different bin uses all significantly impact performance in communal properties. Improving the supervision, signage and labelling of the bins in communal bin stores, as well as ensuring all residents are regularly provided with service information could help improve performance going forward. Further information on improving recycling performance in urban areas and making recycling work for people in flats is available from [WRAP](#) and [ReLondon](#) (formerly LWARB).

# Appendix 1 Cardiff kerbside and communal properties recycling service

Table 19: Kerbside and Communal properties recycling service

Main Categories	Sub-categories	Communal	Kerbside
		Recyclable in communal service?	Recyclable at Kerbside?
1. Paper and Card	Recyclable paper packaging	Yes (Dry Recycling)	Yes (Dry Recycling)
	Recyclable paper non-packaging	Yes (Dry Recycling)	Yes (Dry Recycling)
	Thin card packaging	Yes (Dry Recycling)	Yes (Dry Recycling)
	Thin card non-packaging	Yes (Dry Recycling)	Yes (Dry Recycling)
	Corrugated card packaging	Yes (Dry Recycling)	Yes (Dry Recycling)
	Corrugated card non-packaging	Yes (Dry Recycling)	Yes (Dry Recycling)
	Drink cartons (Tetra Pak)	Yes (Dry Recycling)	Yes (Dry Recycling)
	Kitchen roll and tissues	No	No
	Food contaminated P&C	No	No
	Other non-recyclable paper and card packaging	No	No
	Other non-recyclable paper and card non-packaging	No	No
2. Plastic Film	Carrier bags	No	No
	Black bin bags	No	No
	Plastic film packaging	No	No
	Plastic film non-packaging	No	No
3. Dense Plastic	Plastic bottles-plain milk or not beverage	Yes (Dry Recycling)	Yes (Dry Recycling)
	Drink bottles > 750ml - single format	Yes (Dry Recycling)	Yes (Dry Recycling)
	Drink bottles > 750ml - multipack	Yes (Dry Recycling)	Yes (Dry Recycling)
	Drink bottles < 750ml - single format	Yes (Dry Recycling)	Yes (Dry Recycling)
	Drink bottles < 750ml - multipack	Yes (Dry Recycling)	Yes (Dry Recycling)
	PTTs	Yes (Dry Recycling)	Yes (Dry Recycling)
	Other dense plastic packaging	No	No
	Other dense plastic non-packaging	No	No
4. Textiles	Clothing	No	No

Main Categories	Sub-categories	Communal Recyclable in communal service?	Kerbside
		Recyclable at Kerbside?	
	Shoes, bags, belts	No	No
	Non clothing textiles	No	No
	Not recyclable or reusable textiles	No	No
5. Other Combustible	Carpet and underlay	No	No
	Furniture	No	No
	Mattresses	No	No
	Nappies	No	No
	Other Absorbent hygiene products (AHPs)	No	No
	Wood and cork	No	No
	Other combustible	No	No
6. Other Non-Combustible	Stones and rubble	No	No
	Plasterboard	No	No
	Other non-combustible	No	No
7. Glass	Glass beverage containers > 750ml - single format	Yes (Dry Recycling)	Yes (Dry Recycling)
	Glass beverage containers > 750ml - multipack	Yes (Dry Recycling)	Yes (Dry Recycling)
	Glass beverage containers < 750ml - single format	Yes (Dry Recycling)	Yes (Dry Recycling)
	Glass beverage containers < 750ml - multipack	Yes (Dry Recycling)	Yes (Dry Recycling)
	Glass bottles and jars -not beverage	Yes (Dry Recycling)	Yes (Dry Recycling)
	Glass non-packaging	No	No
8. Putrescibles	Garden waste	Yes (Garden waste)	Yes (Garden waste)
	Soil	Yes (Garden waste)	Yes (Garden waste)
	Inedible food waste	Yes (Food waste)	Yes (Food waste)
	Potentially edible food waste	Yes (Food waste)	Yes (Food waste)
	Edible food waste	Yes (Food waste)	Yes (Food waste)
	Cooking fat	No	No
	Liquids	No	No
	Other organic	No	No
9. Ferrous Metal	Ferrous drinking cans-single	Yes (Dry Recycling)	Yes (Dry Recycling)
	Ferrous drinking cans-multipack	Yes (Dry Recycling)	Yes (Dry Recycling)
	Ferrous tins	Yes (Dry Recycling)	Yes (Dry Recycling)

Main Categories	Sub-categories	Communal Recyclable in communal service?	Kerbside
		Recyclable at Kerbside?	
	Ferrous aerosols	Yes (Dry Recycling)	Yes (Dry Recycling)
	Other ferrous items	No	No
10. Non-Ferrous Metal	Non-ferrous drinking cans-single	Yes (Dry Recycling)	Yes (Dry Recycling)
	Non-ferrous drinking cans-multipack	Yes (Dry Recycling)	Yes (Dry Recycling)
	Non-ferrous tins	Yes (Dry Recycling)	Yes (Dry Recycling)
	Non-Ferrous aerosols	Yes (Dry Recycling)	Yes (Dry Recycling)
	Alu foil	Yes (Dry Recycling)	Yes (Dry Recycling)
	Other non-ferrous	No	No
11. Waste Electrical and Electronic Equipment	White goods	No	No
	Other electrical items	No	No
	Computers and televisions	No	No
	Other electronic items	No	No
	Mobile phones	No	No
	Other small electronic items	No	No
12. Potentially Household Hazardous Waste Items	Water based paint cans	No	No
	Other paint cans	No	No
	Batteries	No	No
	Other Hazardous Waste	No	No
13. Fine Material	<10 mm Fines	No	No
14. Recycling sacks	Recycling sacks	No	No

## Appendix 2 Potential impact of EPR and DRS schemes

Table 20: EPR and DRS Impact

Main Categories	Sub-categories	Potentially included in DRS?	Potentially included in EPR?
1. Paper and Card	Recyclable paper packaging	No	Yes Packaging
	Recyclable paper non-packaging	No	No
	Thin card packaging	No	Yes Packaging
	Thin card non-packaging	No	No
	Corrugated card packaging	No	Yes Packaging
	Corrugated card non-packaging	No	No
	Drink cartons (Tetra Pak)	No	Yes Packaging
	Kitchen roll and tissues	No	No
	Food contaminated P&C	No	Yes Packaging
	Other non-recyclable paper and card packaging	No	Yes Packaging
	Other non-recyclable paper and card non-packaging	No	No
2. Plastic Film	Carrier bags	No	Yes Packaging
	Black bin bags	No	No
	Plastic film packaging	No	Yes Packaging
	Plastic film non-packaging	No	No
3. Dense Plastic	Plastic bottles-plain milk or not beverage	No	Yes Packaging
	Drink bottles < 750ml - single format	Yes (All in only)	Yes Packaging
	Drink bottles < 750ml - multipack	Yes (All in only)	Yes Packaging
	Drink bottles > 750ml - single format	Yes (Both options)	Yes Packaging
	Drink bottles > 750ml - multipack	No	Yes Packaging
	PTTs	No	Yes Packaging
	Other dense plastic packaging	No	Yes Packaging
Other dense plastic non-packaging	No	No	
4. Textiles	Clothing	No	Potential future scheme
	Shoes, bags, belts	No	Potential future scheme
	Non clothing textiles	No	Potential future scheme
	Not recyclable or reusable textiles	No	Potential future scheme
5. Other Combustible	Carpet and underlay	No	Potential future scheme

Main Categories	Sub-categories	Potentially included in DRS?	Potentially included in EPR?
	Furniture	No	Potential future scheme
	Mattresses	No	Potential future scheme
	Nappies	No	No
	Other Absorbent hygiene products (AHPs)	No	No
	Wood and cork	No	Potential future scheme
	Other combustible	No	No
6. Other Non-Combustible	Stones and rubble	No	Potential future scheme
	Plasterboard	No	Potential future scheme
	Other non-combustible	No	No
7. Glass	Glass beverage containers < 750ml - single format	Yes (All in only)	Yes Packaging
	Glass beverage containers < 750ml - multipack	Yes (All in only)	Yes Packaging
	Glass beverage containers > 750ml - single format	Yes (Both options)	Yes Packaging
	Glass beverage containers > 750ml - multipack	No	Yes Packaging
	Glass bottles and jars -not beverage	No	Yes Packaging
	Glass non-packaging	No	No
8. Putrescibles	Garden waste	No	No
	Soil	No	No
	Inedible food waste	No	No
	Potentially edible food waste	No	No
	Edible food waste	No	No
	Cooking fat	No	No
	Liquids	No	No
Other organic	No	No	
9. Ferrous Metal	Ferrous drinking cans-single	Yes (Both options)	Yes Packaging
	Ferrous drinking cans-multipack	Yes (All in only)	Yes Packaging
	Ferrous tins	No	Yes Packaging
	Ferrous aerosols	No	Yes Packaging
	Other ferrous items	No	No
10. Non-Ferrous Metal	Non-ferrous drinking cans-single	Yes (Both options)	Yes Packaging
	Non-ferrous drinking cans-multipack	Yes (All in only)	Yes Packaging
	Non-ferrous tins	No	Yes Packaging
	Non-Ferrous aerosols	No	Yes Packaging

<b>Main Categories</b>	<b>Sub-categories</b>	<b>Potentially included in DRS?</b>	<b>Potentially included in EPR?</b>
	Alu foil	No	Yes Packaging
	Other non-ferrous	No	No
11. Waste Electrical and Electronic Equipment	White goods	No	No
	Other electrical items	No	No
	Computers and televisions	No	No
	Other electronic items	No	No
	Mobile phones	No	No
	Other small electronic items	No	No
12. Potentially Household Hazardous Waste Items	Water based paint cans	No	No
	Other paint cans	No	No
	Batteries	No	No
	Other Hazardous Waste	No	No
13. Fine Material	<10 mm Fines	No	No
14. Recycling sacks	Recycling sacks	No	No



[www.wrapcymru.org.uk](http://www.wrapcymru.org.uk)

Mae'r dudalen hon yn wag yn fwriadol

# Cardiff's Draft Recycling and Waste Strategy 2021-25

RESULTS REPORT



Gweithio dros Gaerdydd, gweithio gyda'n gilydd  
Working for Cardiff, working together

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#gweithiogydangilydd  
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## Background

Cardiff's draft recycling strategy 2021-25 'Make a change to save our planet- Reduce, Re-use, recycle' outlines our plans to make Cardiff a world-leading recycling city. It aims to ensure that the Council continues to improve recycling services for residents and businesses.

Working with residents and understanding the city's communities is integral to influencing decisions, when seeking to continuously improve our recycling services. Therefore, a 6 week public consultation took place. The results in this report will support the development of the final recycling strategy for 2021-25, and the development of actions to deliver improvements to improve reduction, re-use and recycling.

The 7 key headline aims are:

- Improve material quality
- Increase recycling participation and capture of priority materials
- Increase opportunities for communities and residents to recycle
- Make use of all available data, to develop targeted actions
- Reduce single use plastics
- Encourage and support the prevention, reuse and repair of materials
- Contribute towards developing a circular economy within Wales

## Methodology

- A bilingual online survey was developed by the Waste Strategy team in conjunction with the Cardiff Research Centre.
- The survey was promoted via the council's corporate Facebook, Twitter and Instagram accounts throughout the consultation period, receiving a total of 783 clicks
- There was also a paid-for social media ad campaign targeting all areas of the city, with added focus on areas of the city with traditionally low-response rates to consultations. The ads generated 2,917 clicks through to the consultation site and the ads were viewed 244,569 times (impressions).
- The survey was hosted on the Council website, and promoted to Council employees via DigiGov, Intranet and Staff Information.
- The survey was sent to the Citizens Panel which is made up of over 6,000 Cardiff residents.

## Results

After data cleansing and validation, there were 3,305 responses to the consultation.

There were 2,475 valid Cardiff postcodes identified within the results. The map below (Figure 1) shows population representation at ward level for Cardiff residents.

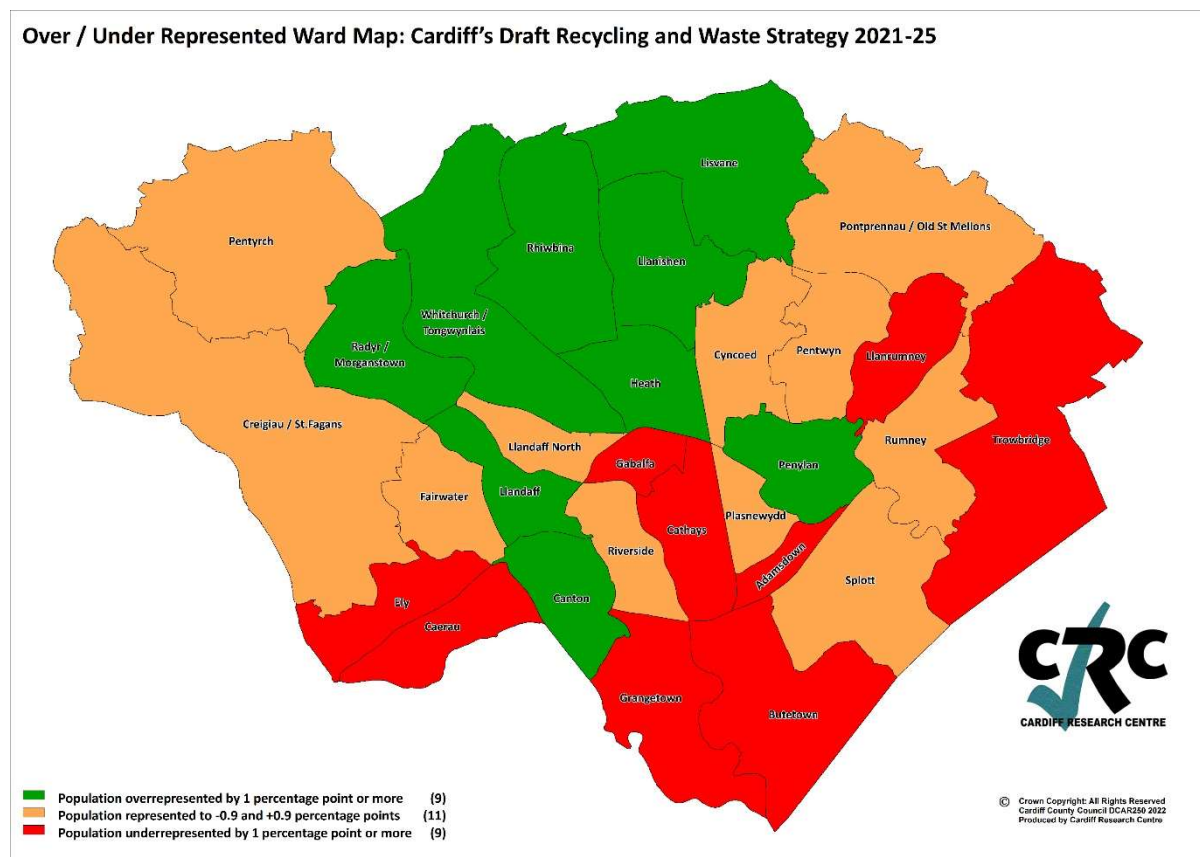


Figure 1. Representation by Ward

Those that did not provide a postcode are included in overall figures but are excluded from spatial analysis.

The responses have been analysed by age and gender, with responses related to households with resident children, southern arc residents, residents with a minority ethnic background, those with a disability, and those living in the least / most deprived areas of the city broken down to provide clear information.

In addition, the analysis includes the response from those living in the 'Southern Arc' of Cardiff which comprises the following electoral divisions: Adamsdown, Butetown, Caerau, Canton, Ely, Grangetown, Llanrumney, Riverside, Rumney, Splott, Trowbridge. (See map at Figure 2).

Specific questions have been viewed by property type which allows us to identify issues impacting respondents in certain types of properties.

## Welsh Index of Multiple Deprivation

To help gain a better understanding of the experiences and views of Cardiff residents an additional level of analysis has been introduced that looks at responses by deprivation fifth.

The Welsh Index of Multiple Deprivation (WIMD) is the official measure of small area deprivation in Wales and is designed to identify those small areas where there are the highest concentrations of several types of deprivation. Each Lower Super Output Area (LSOA) in Wales is ranked in terms of overall deprivation as well as for several separate domains, with a rank of 1 assigned to the most deprived area.

The 216 LSOAs in Cardiff are ranked from highest to lowest by their overall deprivation rank and then split into five equal bands, ranging from least deprived (i.e. least deprived 20% of LSOAs in Cardiff) to most deprived fifth (i.e. most deprived 20%). Respondents are then assigned to a deprivation fifth according to their postcode. As such, respondents from outside Cardiff or those with a missing/incomplete/incorrect postcode will be excluded from this analysis.

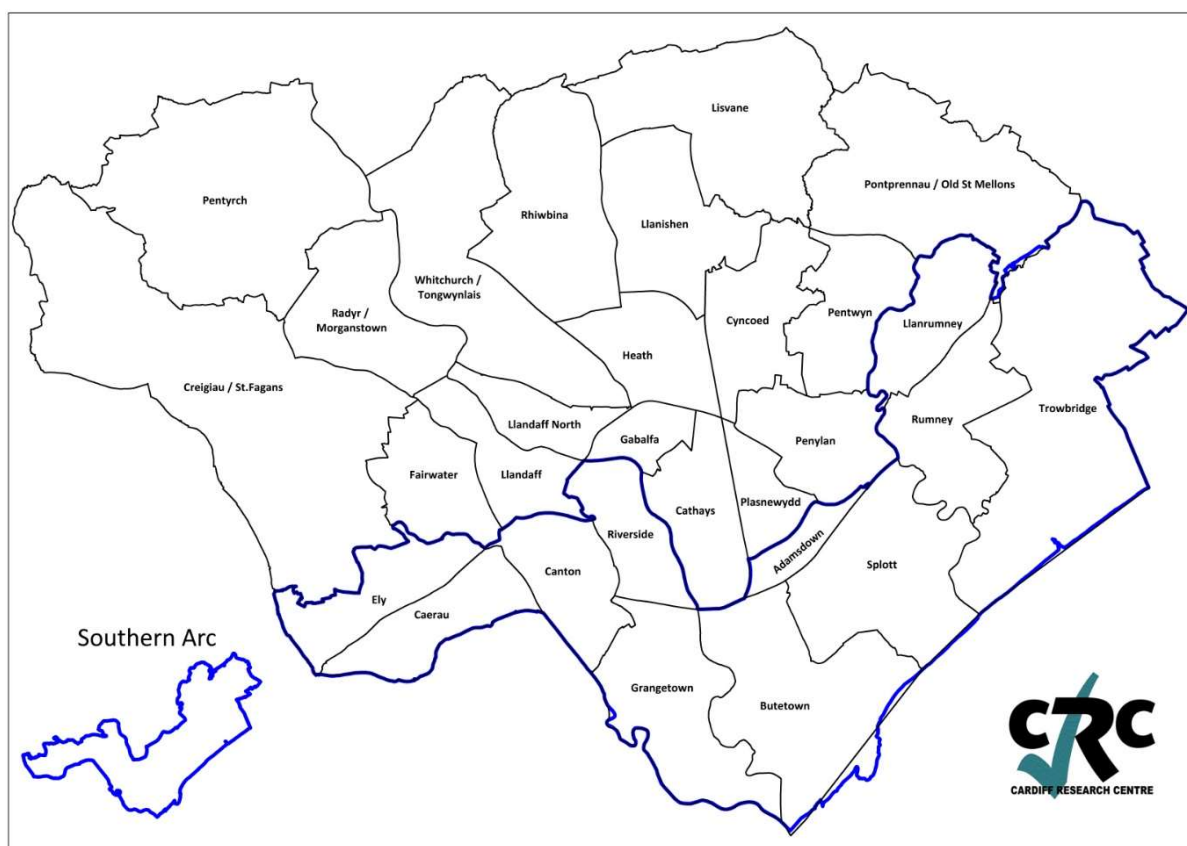


Figure 2. Map of Southern Arc

## Section one – Improve Material Quality

A recent analysis of the material collected from green bags within the City identified that:

- 23.7% of items placed into green bags, collected from the kerbside were incorrect
- 41.4% of items placed into green bags, collected from blocks of flats were incorrect

Whilst our process is able to segregate small items of contamination, for example the incorrect plastic type, the range of 'dirty' material being included is a real issue, for example, food waste, nappies and even medical waste.

For this reason, we lose 30% of the material we collect for recycling, which is then used as fuel to create energy rather than used as a resource and made into new products. To put scale to the issue, that's over 10,000 tonnes of material lost in 2019/20. That's the weight of 10,000 giraffes!

While educating residents and enforcing correct use (by issuing £100 Fixed Penalty Notices) can play a part in changing behaviour, we know that an improved recycling service is required. Staying as we are is not an option.

Further separation of materials will improve the quality of items collected. Choosing a container that is not single use and needs to be returned to a property will encourage residents to use them correctly. It's also a more sustainable option.

We have considered a number of recycling collection options that are available to us, these options are explored in more detail in the draft recycling and waste strategy but can be briefly summarised as:

**Full kerbside sort** - this option requires the full separation of all recyclable materials, with 4 separate containers provided for glass, paper, cardboard and tins/cans/plastic bottles, tubs and trays. All recyclable materials, including food, are collected on a single collection vehicle and sorted into their own individual compartments on the collection vehicle.

**'Three stream' collection** - this option still requires the separation of material, but paper and cardboard is mixed together. Residents will have 3 separate containers for glass, paper/cardboard and tins/cans/plastic bottles, tubs and trays. Recycling is collected on one vehicle, and food waste is collected by a separate vehicle.

We have also considered the recycling container options available, which are re-useable hessian sacks, rigid boxes, stackable boxes, wheeled bins, kerbside caddies. There are a number of things to consider when choosing the most suitable container type for the whole City, including:

- Storage for differing housing types

- Size/capacity (e.g. a rigid box is 55L whereas a sack is 90L. A standard green recycling bag is 60L)
- Health and safety within collections
- Cost
- How material quality may be impacted (e.g. crews would be unable to see the contents of a wheeled bin)

Do you agree that Cardiff needs to improve the quality of material collected?

Over four in five (85.0%) respondents agreed that Cardiff needs to improve the quality of material collected.

	No.	%
Yes	2,677	85.0
No	471	15.0
Total Respondents	3,148	100.0

At least 80% of respondents within each demographic and geographic group agreed that Cardiff needs to improve the quality of material collected.

There was no correlation with level of deprivation.

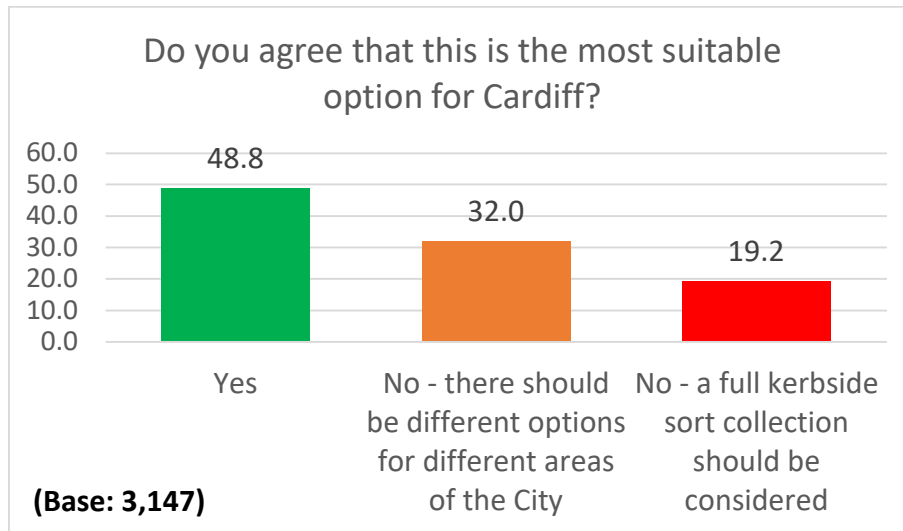
After considering these options, and on balance with the challenges faced within an urban City we are currently trialling a new and improved collection method across 4,000 properties across the City. This collection involves 3 containers being provided, which is the 'three stream' collection option:

- A red re-useable sack for paper and cardboard
- A blue re-useable sack for tins/cans and plastic bottles, tubs and trays
- A glass caddy for glass bottles and jars



Do you agree that this is the most suitable option for Cardiff?

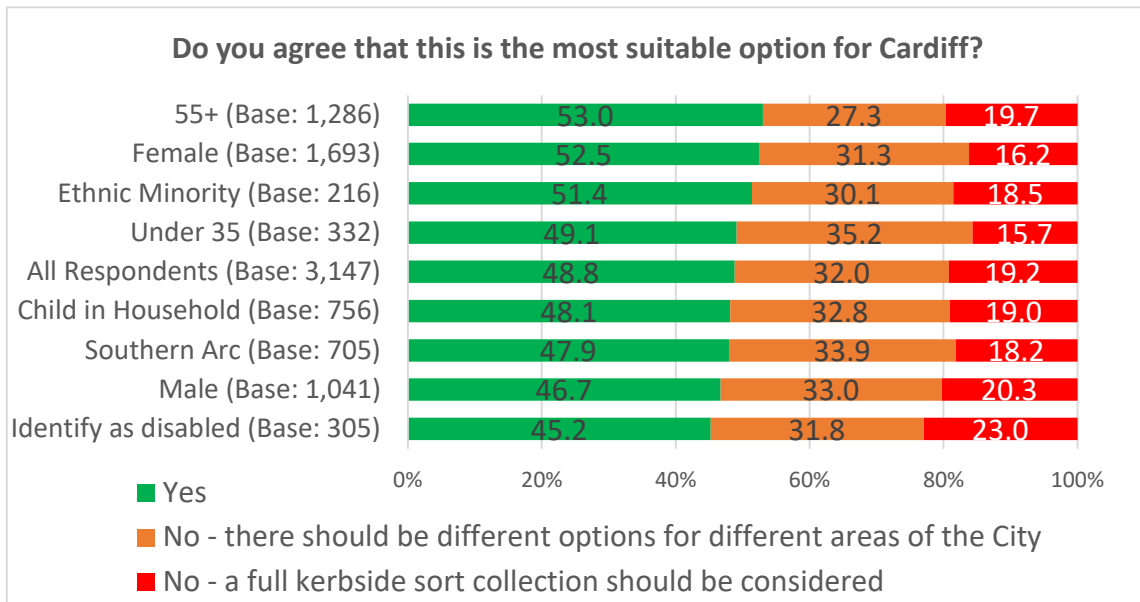
Almost half (48.8%) of respondents agreed with the proposals. Around one in three (32.0%) felt there should be different options for different areas of the City, whilst one in five (19.2%) felt that that a full kerbside sort collection should be considered.



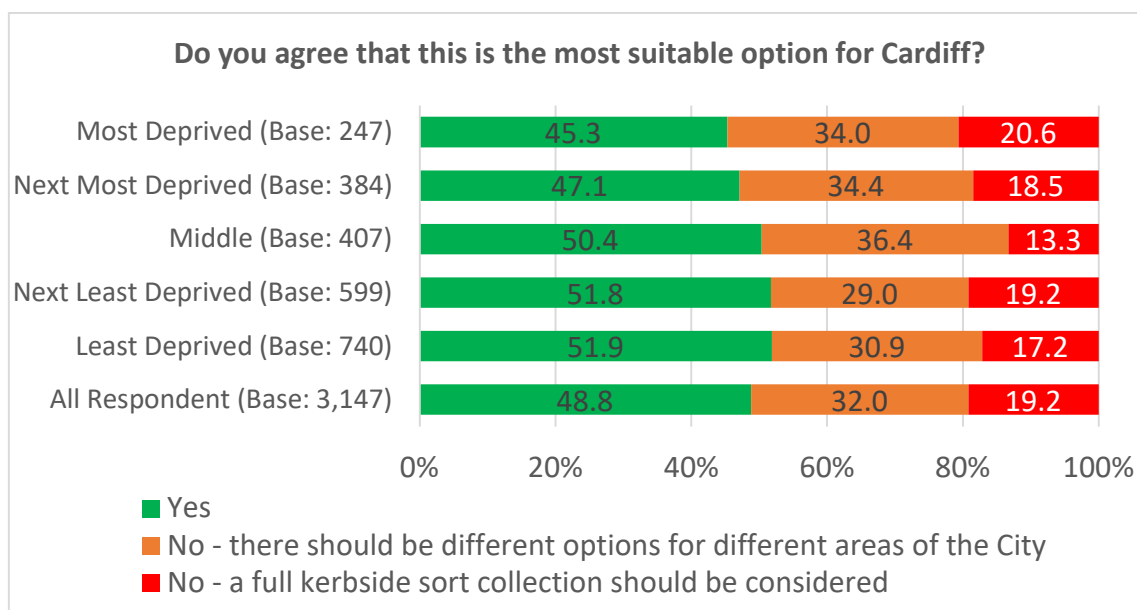
At least 40% of respondents within each demographic and geographic group agreed that this is the most suitable option for Cardiff.

Agreement was highest amongst those aged 55+ (53.0%) and females (52.5%); it was lowest amongst those identifying as disabled (45.2%), and males (46.7%).

Those identifying as disabled (23.0%) were the group that showed the greatest interest in a full kerbside collection; this drops to 15.7% when viewed by those aged under 35.



Respondents living in the least deprived areas of the city were more likely to agree that this is the most suitable option for Cardiff than those living in the least deprived areas (51.9% and 45.3% respectively).



Respondents living in semi-detached properties were most likely to agree (51.1%); those living in a Flat, Maisonette, Bedsit, Studio or Room only (43.8%) were least likely to agree.

Over two fifths (43.8%) of those living in a Flat, Maisonette, Bedsit, Studio or Room only cited '**No - there should be different options for different areas of the City**'; this is 16 percentage points higher than those living in a semi-detached property (27.8%).

If no, please explain your reasons why

Respondents were given the opportunity to explain the reason why they think there should be different options for different areas, or think that a full kerbside collection should be considered.

**No – A full kerbside sort collection should be considered**

All comments were grouped into themes, the top three themes along with example comments can be viewed below and overleaf. A full breakdown can be found in Appendix A.

Theme	No	%	Example Comment
Reusable sacks being blown away / not fit for purpose	149	33.2	<ul style="list-style-type: none"> <li>I feel that reusable sacks will get blown away/lost easily and have the potential for rubbish to be blown around the streets. Will they be waterproof enough to protect the paper recycling? HMOs already have a lot of bins outside</li> <li>These sacks empty their contents in the slightest breeze</li> </ul>

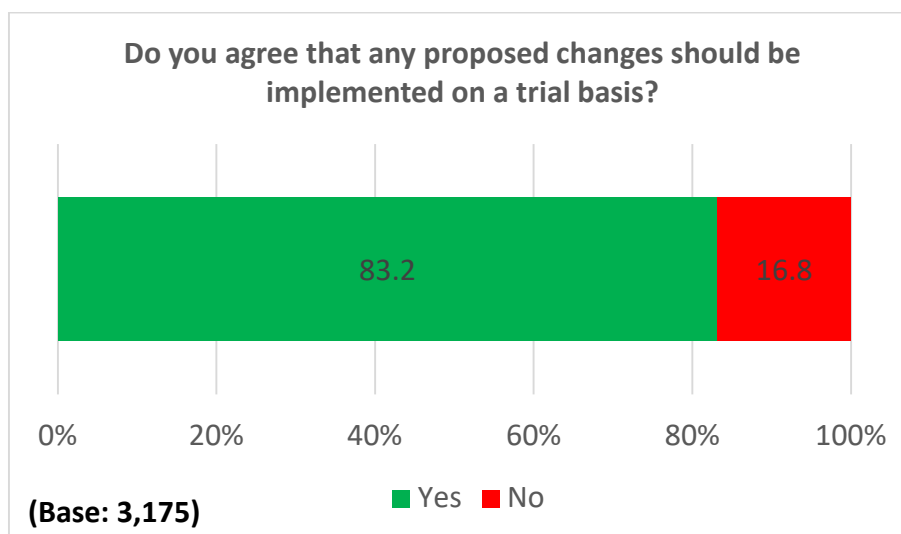
			<ul style="list-style-type: none"> <li>• The current containers are totally unsuitable and are already leading to messy streets especially and the carts no longer come around. The contents get wet dirty and already the containers are becoming unpleasant</li> <li>• There will be a risk to traffic on windy days when empty bags blow around</li> <li>• Bags get wet, difficult to dry wet bags and store in house, bags blow away</li> </ul>
Storage concerns	129	28.7	<ul style="list-style-type: none"> <li>• Some people do not have the space in their homes for 3 separate refuse bins, example, people in 1 bedroom flats, the kitchens are tiny &amp; have no room for 3 separate bins</li> <li>• Nowhere to store the bags and rubbish live on busy street where bags will disappear and become lost</li> <li>• Terraced houses with no rear access have no room for all the different sacks</li> <li>• There isn't enough space in most properties for all these sorting containers, and people would not bring wet soggy dirty bags into their house.</li> <li>• Too many containers involved. They will become dirty very quickly and nowhere to store them.</li> </ul>
Sorting concerns	63	14.0	<ul style="list-style-type: none"> <li>• People will still not learn and still mix waste it is up to the council to improve their internal processes</li> <li>• Having to sort at home will discourage people from recycling.</li> <li>• The Council should sort after collection not before</li> <li>• It's a lot of work and still doesn't guarantee the right product for recycling being placed in the correct bin</li> <li>• people will be less inclined to sort properly leading to less recycling, I've lived in Swansea and people there can't be bothered to use all the different bags.</li> </ul>

**No – There should be different options for different areas of the city**

All comments were grouped into themes, the top three themes along with example comments can be viewed below. A full breakdown can be found in Appendix B.

Theme	No	%	Example Comment
Storage concerns	418	46.5	<ul style="list-style-type: none"> <li>• Where do you intend, I keep your extra sacks or boxes? My house isn't any bigger than it was before.</li> <li>• I live in a small flat and have no room. For 3 recycling bins, food waste bin and general waste bin.</li> <li>• Unfortunately, we do not have space in our house for additional bins. We already have five when considering recycling, landfill, food, supermarket bags &amp; teracycle.</li> <li>• Our homes aren't designed for so many storage options</li> <li>• Too many bags in my flat, how can I fit 5 bins in a small kitchen?</li> </ul>
Vary approach by accommodation type / area	342	38.0	<ul style="list-style-type: none"> <li>• Different types of property may require different options due to storage space available</li> <li>• Not everywhere has storage, houses aren't the same as flats etc</li> <li>• Different issues / risks in more rural locations</li> <li>• Take Grangetown - HMOs, houses with gardens for bins, blocks of flats with shared bins, houses that open onto the street. One size cannot fit all</li> <li>• It cannot be a one size fits all for such different housing stock - consider the differences between properties in Cyncoed (plenty of room) with terraced housing - limited indoor space</li> </ul>
Bags not fit for purpose / unsecure/ blow away /porous / unhygienic	172	19.1	<ul style="list-style-type: none"> <li>• Reusable sacks are going to blow away once empty.</li> <li>• I live on Newport Road, sacks will get taken, blown away across traffic this will cause accidents</li> <li>• Sacks blow away and tear too easily (know from previous experience)</li> <li>• Bags will break, they will smell some built up areas waste will be spilt onto roads</li> <li>• Sacks blow away and we have to pay to replace them, they're also nasty to move through the house if wet, glass bins need to be larger than those trialled previously and have better closure, so they don't fill with water</li> </ul>

Do you agree that any proposed changes should be implemented on a trial basis?  
 Over four fifths (83.2%) of respondents agreed that the proposals should be implemented on a trial basis.



Agreement was highest amongst females (86.9%) and those respondents aged 55+ (84.6%); it was lowest amongst males (78.6%), and those residing in the Southern Arc of the City (80.3%).

There was no correlation with level of deprivation.

If we were to provide alternative containers for your recycling across the city, which would you prefer:

**'Recycling Caddies'** was viewed as the preferred receptacle, with over one in three (36.9%) choosing this option. Three in ten (29.7%) would like **'Recycling boxes'** as an alternative.

	No.	%
Recycling caddies	1,029	36.9
Recycling boxes	828	29.7
Re-useable hessian sacks	491	17.6
Other	438	15.7
Total Respondents	2,786	100.0

*N.B. Don't know responses have been removed from the analysis*

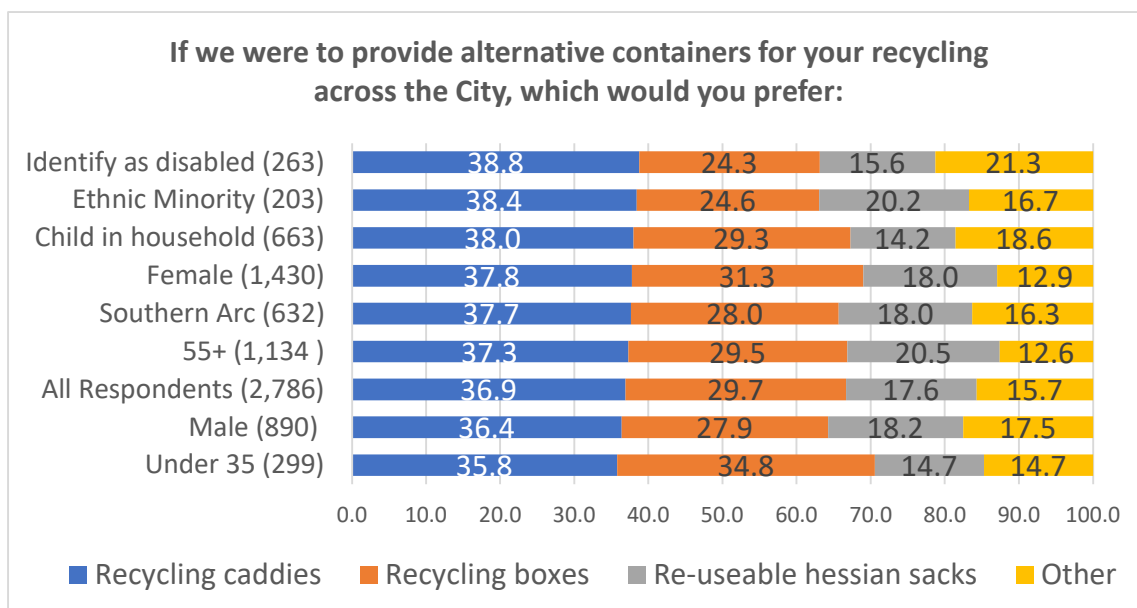
If other, please specify:

Respondents who selected 'Other' had their comments grouped into themes. The top three themes, along with example comments can be viewed below and overleaf. A full breakdown can be viewed in Appendix C.

Theme	No.	%	Example Comment
Keep current system	109	25.9	<ul style="list-style-type: none"> <li>I'm happy with the system we have, if people can't get that right they will never get a new system right.</li> <li>Keep it as it is. Green bags</li> </ul>

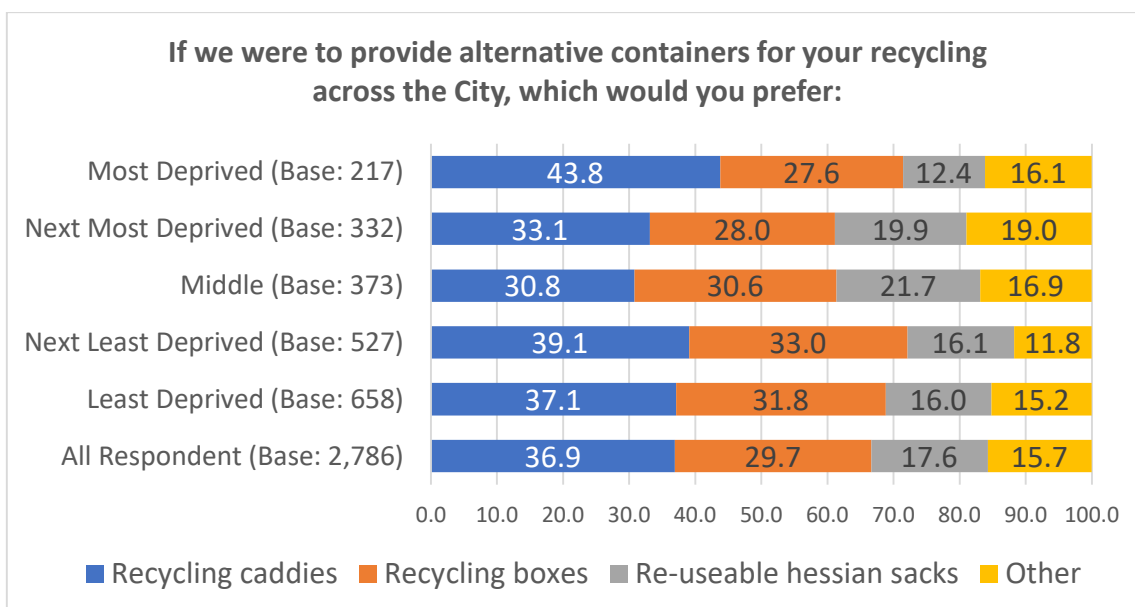
			<ul style="list-style-type: none"> <li>• best as it is now!!</li> <li>• Green bags which are 76.3% effective.</li> <li>• The current bag system, fill in kitchen, take outside, I've no idea where all this proposed new stuff will be kept.</li> <li>• Stick to the current but increase education and the fine process.</li> </ul>
Wheelie bins / Weatherproof bins	100	23.8	<ul style="list-style-type: none"> <li>• Bins with lids - keeping items fully dry and rats out!!!!!!</li> <li>• Enclosed recycling bins for outside that are weatherproof</li> <li>• Something weatherproof (rain &amp; wind) with a lid that is large enough to contain the amount of recycling.</li> <li>• 2 wheelie bins 1 for plastics and 1 for cardboard and paper</li> <li>• Wheelie bins (something solid plastic...not bags or sacks as these blow away even if weighted)</li> </ul>
Storage concerns	53	12.6	<ul style="list-style-type: none"> <li>• Caddies that can be taken and recycled as consumers do not have to bring and store wet caddies. Not everybody has room or space to bring in wet sacks</li> <li>• Keep to plastic sacks easy to store rather than containers which take up room to store.</li> <li>• Box's with lids as I would have to store outside as no room in house</li> <li>• None of the above - don't have room for them.</li> <li>• At the moment householders don't recycle what make you think this is any better. householders don't have the room in their premises for all these bags especially those who live in flats. this is crazy</li> </ul>

The preference for 'Recycling Caddies' was top amongst each of the demographic and geographic groups analysed.



**Base sizes are in brackets**

As with the demographic breakdowns, the preference for 'Recycling Caddies' was top amongst each of the deprivation breakdowns, most notably in the most deprived areas of Cardiff where over two fifths (43.8%) chose this option, this is 6.9 percentage points higher than in the overall findings (36.9%).



Respondents living in a Flat, Maisonette, Bedsit, Studio or Room only were the least likely to want 'Recycling Caddies' (30.5%).

How do you currently store your recycling before collection?

The most common method for currently storing recycling before collection is to **'Store in an external bin or container'** (30.5%). One in four (24.8%) **'Keep bags full inside until collection day'**, whilst around one in six (15.2%) **'Store in a garage or outbuilding'**.



If other, please specify:

Respondents who selected 'Other' had their comments grouped into themes. The top three themes, along with example comments can be viewed below and overleaf. A full breakdown can be viewed in Appendix D.

Theme	No.	%	Example Comment
Outside property- Garden / Drive	823	90.8	<ul style="list-style-type: none"> <li>• Keep full bags in front garden next to bins.</li> <li>• store full bags outside until collection day</li> <li>• In the garden in bags</li> <li>• In the front space of the property, outside</li> <li>• Leave outside house on drive</li> <li>• Just leave them outside the back door</li> <li>• They sit outside in the yard because I have no other space</li> <li>• In my side garden, where it is not seen.</li> <li>• Outside house on private sheltered area</li> <li>• store outside behind garden gate on path</li> </ul>
Inside property	62	6.8	<ul style="list-style-type: none"> <li>• Store them in an open container in the house then bag for collection.</li> <li>• I have an internal bin for recycling alongside my internal bin for non-recycling. They are designed to be attractive and sit next to each other in my kitchen.</li> <li>• Normally we produce less than one recycle bag per week, so it can stay in its container until it's ready to go.</li> <li>• Indoor bins in bin bags</li> </ul>

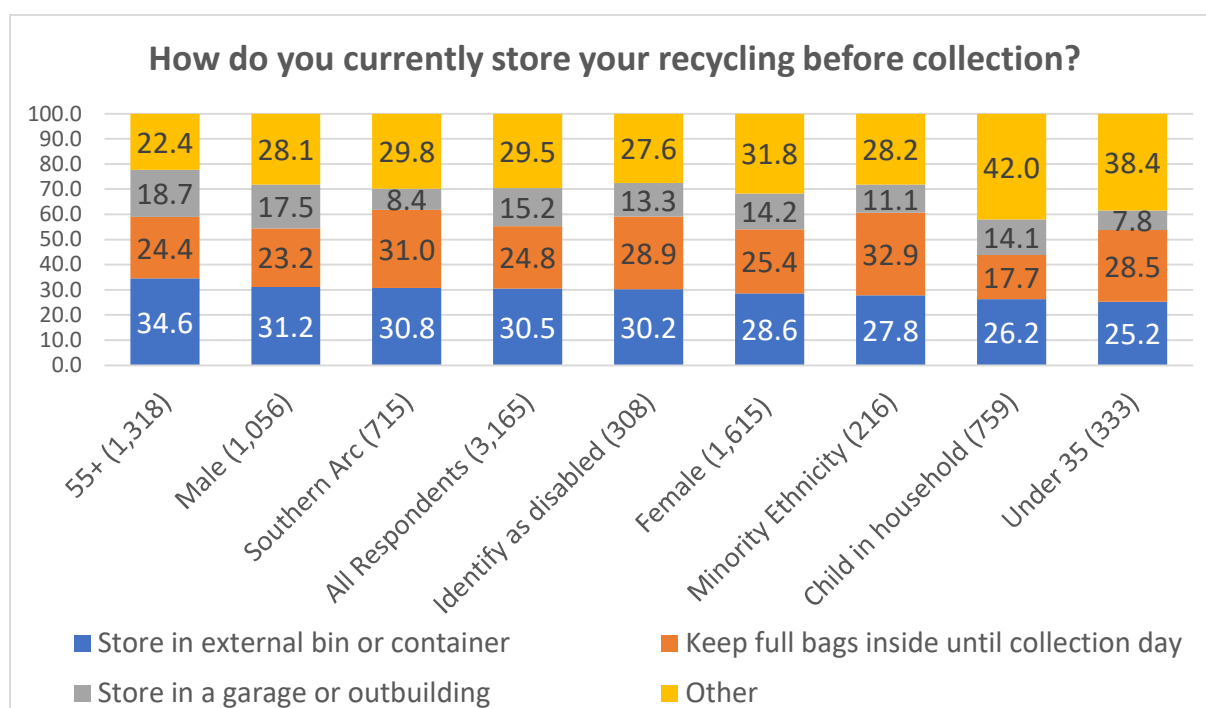


			<ul style="list-style-type: none"> <li>• Store in box in kitchen and transfer to green bag the night before collection.</li> </ul>
External Storage unit - large bins/ Shed/Garage/	24	2.6	<ul style="list-style-type: none"> <li>• Store in my own purchased bins</li> <li>• My sheds out my back garden</li> <li>• Built storage units in drive</li> <li>• Store excess cardboard in garage or external container until dry collection day</li> </ul>

Respondents aged 55+ were much more likely to **'Store in an external bin or container'** than their counterparts aged under 35 (34.6% and 25.2% respectively).

Those from ethnic minorities and those from the Southern Arc were most likely to **'Keep full bags inside until collection day'** (32.9% and 31.0% respectively).

Respondents aged 55+ were more than twice as likely to **'Store in a garage or outbuilding'** than those aged under 35 (18.7% and 7.8% respectively).



Almost three in ten (28.5%) respondents from the most deprived areas of Cardiff currently **'Keep full bags inside until collection day'**, this compares with just over one in five (21.3%) in the least deprived.

Respondents in the least deprived areas were twice as likely to **'Store in a garage or outbuilding'** as those in the most deprived areas (20.9% and 10.0% respectively).

One in five respondents living in a detached or a semi-detached property (19.4% and 19.9% respectively) currently **'Keep full bags inside until collection day'**; this rises to over one in three (37.4%) when viewed by Respondents who live in a Flat, Maisonette, Bedsit, Studio or Room only.

Less than one in ten of those residing in a Flat, Maisonette, Bedsit, Studio or Room only or a Terraced property (8.8% and 8.5% respectively) currently '**Store in a garage or outbuilding**'; this rises to one in four (25.6%) when viewed by those that live in a detached property.

Do you recycle every week?

Almost all (98.0%) respondents recycle every week. 64 (2.0%) respondents either don't recycle every week or don't recycle at all.

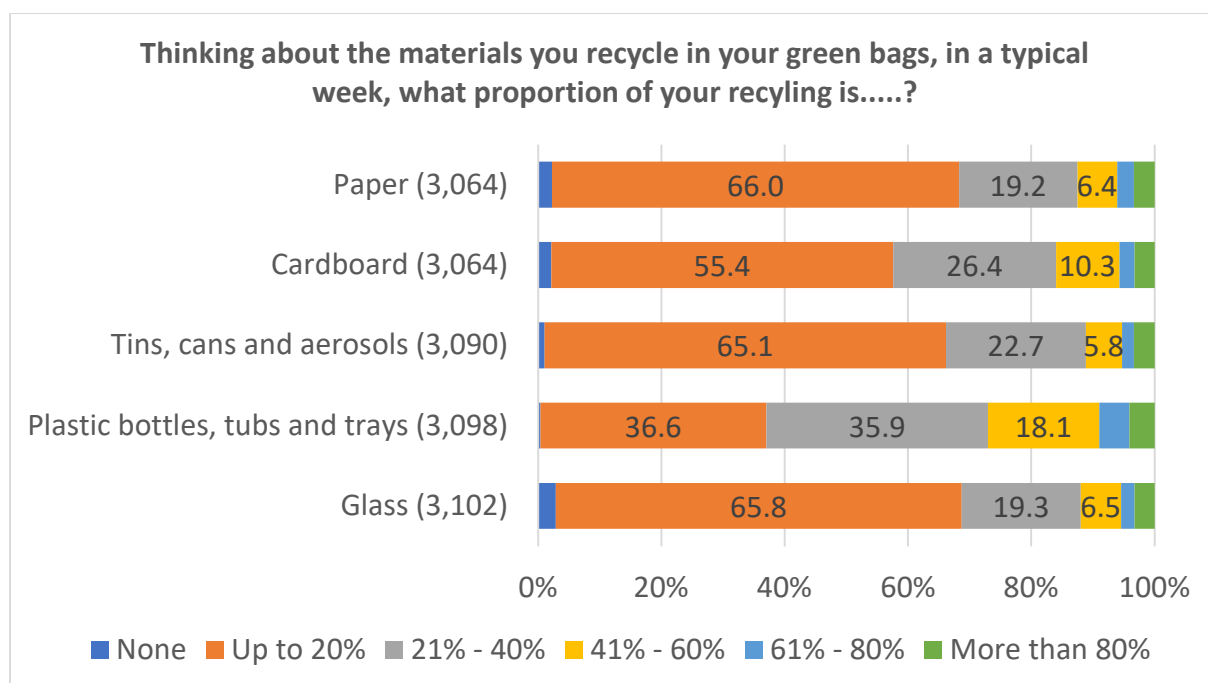
	No.	%
Yes	3,101	98.0
No	61	1.9
I don't recycle	3	0.1
Total Respondents	3,165	100.0

These findings were consistent across the demographic and geographic groups analysed.

Thinking about the materials you recycle in your green bags, in a typical week, what proportion of your recycling is.....?

When asked the proportion of materials recycled, there was a spread, indicating there was no dominant material placed in the green bag, suggesting that people recycle as many types of items as possible.

Over a third (35.9%) of respondents indicated that plastic bottles, tubs and trays made up 21-40% of their green bag in a typical week, with a further 18.1% saying it made up 41-60% of their recycling.



Where do you go to access information about the correct materials to put into recycling bags?

**'Cardiff Council website'** (54.4%) was viewed as the most popular place respondents would go to access information about the correct materials to put into recycling bags. Around three in ten would **'Look on the green recycling bags'** and/or **'Look on packaging'** (32.0% and 30.1% respectively).

Just 2.6% of respondents claimed they **'Don't know where to look for the information'**.

	No.	%
Cardiff Council website	1,704	54.4
Look on the green recycling bags	1,003	32.0
Look on packaging	941	30.1
Cardiff Gov app	811	25.9
Don't know where to look for information	82	2.6
Request advice from local community / Ask Neighbour	62	2.0
Contact Cardiff Council digitally	35	1.1
Contact Cardiff Council over the phone	12	0.4
Other	127	4.1
Total Respondents	3,131	-

*N.B. Percentages total more than 100% as respondents could select more than one option*

If other, please specify:

Respondents who selected 'Other' had their comments grouped into themes. The top three themes, along with example comments can be viewed below. A full breakdown can be viewed in Appendix E.

Theme	No.	%	Example Comment
Council correspondence	38	31.1	<ul style="list-style-type: none"> <li>• Leaflet delivered with sacks and caddy</li> <li>• On trial and use booklet provided.</li> <li>• Refer to the Leaflet that was put through the door - keep it on the side of the fridge</li> <li>• Booklet</li> </ul>
Online / social media	21	17.2	<ul style="list-style-type: none"> <li>• Cardiff council Facebook</li> <li>• Wales online</li> <li>• Wales Recycles</li> <li>• Recycle Now</li> </ul>
I know what materials recycled/ Recycle what I think is correct	20	16.4	<ul style="list-style-type: none"> <li>• I know what goes where</li> <li>• Common sense</li> <li>• Just put what I think can be recycled into green bag</li> <li>• Make own decisions.</li> </ul>

Almost two fifths (38.7%) of respondents aged under 35 would **'Look on the packaging'**, this compares with around one in four (26.5%) of those aged 55+.

Respondents aged under 35 and those from an ethnic minority were the two groups most likely to claim that they **'Don't know where to look for information'** (5.4% and 5.1% respectively), this is around double that of the overall findings (2.6%).

Three in ten (29.3%) respondents from the least deprived areas would **'Look on the green recycling bags'**, this rises to over one in three (36.8%) when viewed by respondents from the most deprived areas.

Just over one in four (26.3%) respondents from the least deprived areas would **'Look on packaging'**, this rises to over one in three (35.6%) when viewed by respondents from the most deprived areas.

If you don't know whether an item can be recycled in your green bags, what do you do with it?

When respondents were unsure whether an item could be recycled in their green bags or not, around two in five would either **'Make every effort to find out how to recycle it'** or alternatively, they'd **'Put it in their black bin / red striped bags'** (41.7% and 41.1% respectively).

86 (2.8%) respondents indicated that they'd **'Take the item to a Household Recycling Centre'**.

	No.	%
Make every effort to find out how to recycle it	1,303	41.7
Put it in my black bin/red striped bag	1,284	41.1
Put it in the green bag anyway	373	11.9
Take it to a Household Recycling Centre	86	2.8
Something else	79	2.5
Total Respondents	3,125	100.0

If something else, please specify:

Respondents who selected 'Other' had their comments grouped into themes. The top three themes, along with example comments can be viewed below and overleaf. A full breakdown can be viewed in Appendix F.

Theme	No.	%	Example Comment
Put in Black Bin / Green Bags	31	42.5	<ul style="list-style-type: none"> <li>• Make a judgement to put it in green bag or black bin</li> <li>• I make every effort to recycle but the. It has to go in the black bin if no joy.</li> <li>• Put them in the general waste bin</li> <li>• Guess - black bin or green bag</li> </ul>

Find out information myself	30	41.1	<ul style="list-style-type: none"> <li>• Check the product packaging</li> <li>• check on website</li> <li>• Look online to see where it goes</li> <li>• Ask neighbours</li> </ul>
Take to recycling centre / Similar scheme	12	16.4	<ul style="list-style-type: none"> <li>• Depends what it is, household recycling centre or other scheme</li> <li>• Teracycle</li> <li>• Google to find out where it can be recycled taking advantage of volunteer run tetracycline schemes in the community</li> </ul>

Female respondents and those aged 55+ were the two groups most likely to **'Make every effort to find out how to recycle it'** (45.1% and 42.2% respectively); the least likely groups were those aged under 35 and respondents from a minority ethnicity (33.3% and 34.7% respectively).

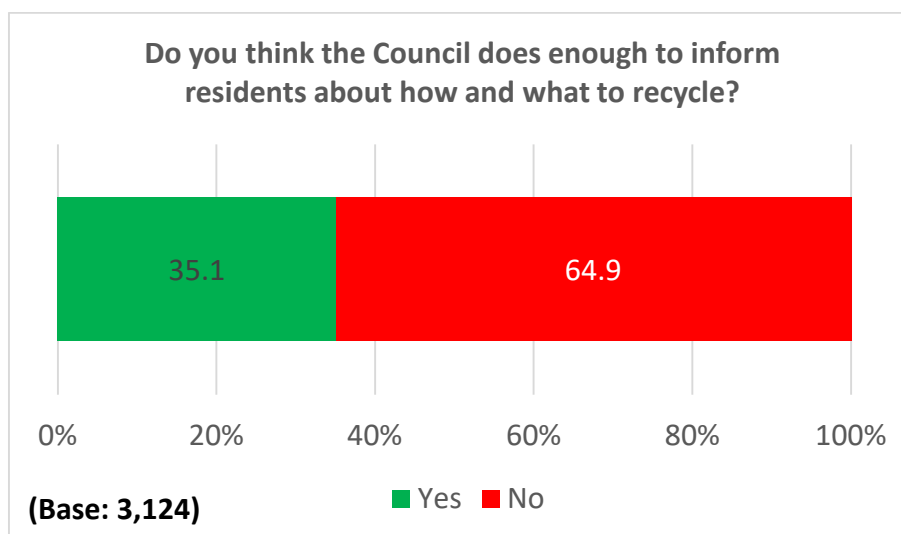
Just over one in three (34.4%) respondents who identify as disabled would **'Put it in my black bin/red striped bag'**, this rises to 47.7% when viewed by those from a minority ethnicity.

One in ten (9.8%) respondents aged under 55+ would **'Put it in the green bag anyway'**, this rises to almost one in five (17.7%) when viewed by those aged under 35.

Just over one in three (35.9%) of those respondents residing in the most deprived areas of Cardiff would **'Make every effort to find out how to recycle it'**, this compares with 43.3% in the least deprived areas.

Do you think the Council does enough to inform residents about how and what to recycle?

Only around one in three (35.1%) respondents feel that the council does enough to inform residents about how and what to recycle.



Less than two fifths of all demographic and geographical groups analysed agreed that the council does enough to inform residents about how and what to recycle. Agreement was lowest amongst respondents who identify as disabled and those aged under 35 (30.9% and 32.7% respectively).

There was no correlation by deprivation.

If no, or if you have any comments, how could we improve this?

Respondents who felt the Council didn't do enough to inform residents about how / what can be recycled were presented with a list of pre-coded options as to how they felt the Council could improve on this.

**'Making better use of social media and other digital platforms'** was viewed as the main way the Council could make progress on this matter, with over three in five (63.0%) citing this option. This was followed by **'Deliver more leaflets / letters to households'** (55.1%) and **'Work with children, including schools and youth clubs'** (37.2%).

	No.	%
Make better use of social media, and other digital platforms	1,266	63.0
Deliver more leaflets/letters to households	1,107	55.1
Work with children, including schools and youth clubs	747	37.2
Work with communities and volunteers to help deliver messages	527	26.2
Issue £100 Fixed Penalty Notices for repeated incorrect use, to act as a deterrent	441	22.0
Improve the range of languages that information is available in	371	18.5
Increased outreach sessions in community locations	355	17.7
More face-to-face door knocking	233	11.6
Other	255	12.7
Total Respondents	2,009	-

*N.B. Percentages total more than 100% as respondents could select more than one option*

If other, please specify:

Respondents who selected 'Other' had their comments grouped in these. The top three theses, along with example comments can be viewed below and overleaf. A full breakdown can be viewed in Appendix G.

Theme	No	%	Example Comment
Clearer / Accurate / more accessible information	156	62.9	<ul style="list-style-type: none"> <li>It seems really complicated what can and can't be recycled. Is there a way of simplifying this information to make it clearer?</li> <li>Improve the recycling website for more comprehensive information</li> </ul>

			<ul style="list-style-type: none"> <li>• More posts on social media groups (i.e., FB reuse groups) and radio</li> <li>• On website have a search facility where u can enter items name and it can then advise correct recycling process</li> <li>• Email residents when their collection is due with an attachment of what goes in the green bag</li> <li>• A fridge magnet or something that isn't just going to end up being lost or recycled</li> <li>• Work with large stores to have information on what can and can't be recycled.</li> </ul>
Recycle more items / More improved recycling centres	36	14.5	<ul style="list-style-type: none"> <li>• Provide teracycle bins</li> <li>• Find a way to recycle things that currently can't be recycled</li> <li>• Have more places to recycle tetra packs and plastic that can be recycled with carrier bags. Also, more places for batteries</li> <li>• Have a permanent hire in North Cardiff. Just Saturdays for a limited time frame and limited materials not good enough!</li> </ul>
Educate / show benefits of recycling / Not fines	25	10.1	<ul style="list-style-type: none"> <li>• Indicate on sacks which are left by your operatives, the reason why they're left and stop fining people, unless their actions are grossly taking the mick.</li> <li>• Stop issuing fines as it does not act as a deterrent, improve education</li> <li>• Better understanding how incorrect/contaminated waste means whole bags need to be destroyed.</li> <li>• No fines - plenty of residents dump their rubbish in the wrong bin knowing others get the blame. Education and constant messaging is the answer.</li> </ul>

**'Make better use of social media, and other digital platforms'** was highest amongst females (68.2%) and lowest amongst males (57.5%).

Almost two thirds (65.0%) of those aged under 35 would like the council to **'Deliver more leaflets/letters to households'**, this compares with 52.2% of those that have a child in the household.

Over one in three (35.5%) respondents who identify as disabled would like the council to **'Work with communities and volunteers to help deliver messages'**, this compares with just over one in five (21.6%) when viewed by male respondents.

Around one in five respondents aged 55+ / have a child in the house (19.0 and 19.9% respectively) would like the council to **'Issue £100 Fixed Penalty Notices for repeated incorrect use, to act as a deterrent'**, this compares with almost three in ten when viewed by under 35's and those that reside in the southern arc (28.3% and 28.8% respectively).

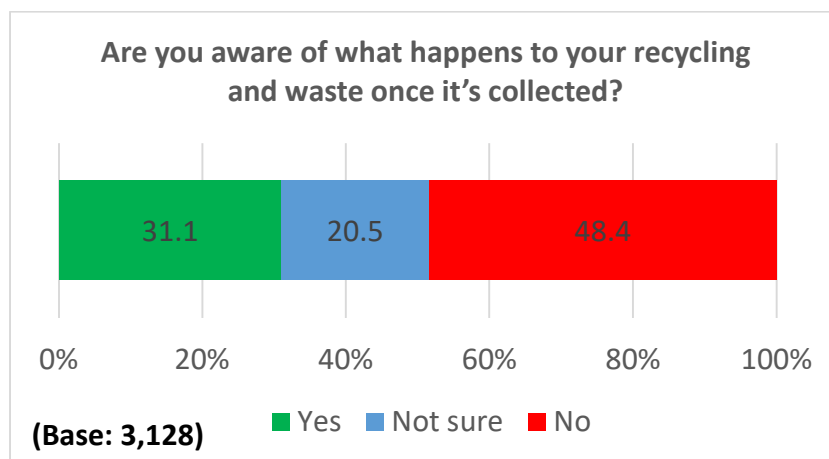
Respondents who identify as disabled and those from a minority ethnicity were the two groups with the greatest proportion of respondents who would like the council to **'Increase outreach sessions in community locations'** (23.7% and 21.1% respectively).

**'Make better use of social media, and other digital platforms'** was the preferred approach across each of the deprivation groups.

A quarter (25.3%) of respondents residing in the most deprived areas of Cardiff would like the council to **'Issue £100 Fixed Penalty Notices for repeated incorrect use, to act as a deterrent'**, this compares with around one in six (17.4%) from the least deprived areas.

A quarter (24.7%) of respondents residing in the most deprived areas of Cardiff would like the council to **'Improve the range of languages that information is available in'**, this compares with around one in seven (14.5%) of those from the least deprived areas.

Are you aware of what happens to your recycling and waste once it's collected?  
Less than a third (31.1%) of respondents were aware of what happens to their recycling and waste when it's collected. One in five (20.5%) were unsure, whilst almost a half (48.4%) stated that they didn't know.



Respondents from a minority ethnicity and those who identified as disabled were the two groups most likely to know what happens to their recycling and waste once it's collected (38.5% and 37.4% respectively).

Almost three in five (58.7%) of those aged under 35 stated that they did not know what happens.

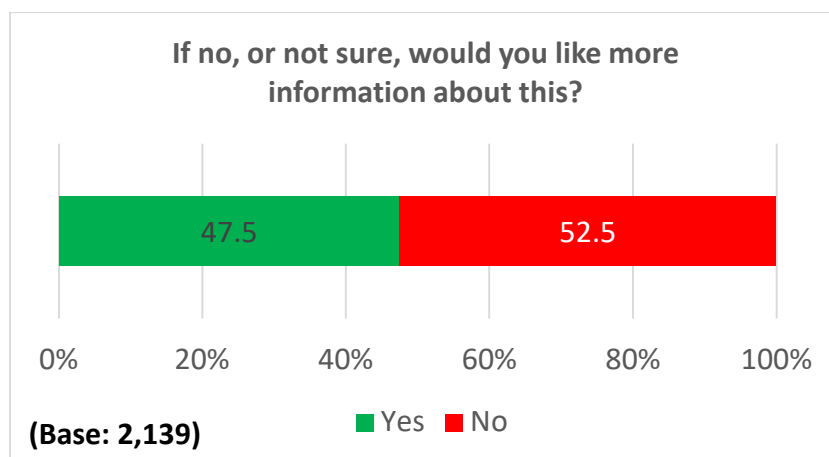
Over one in three (34.8%) respondents from the most deprived areas of Cardiff are aware of what happens to their recycling and waste once it's collected, this compares to 31.1% in the least deprived areas.



If no, or not sure, would you like more information about this?

Respondents who stated they were not sure or didn't know what happens to waste once it's recycled were asked if they'd like more information about this.

Opinion was split as to whether people would or would not like additional information on this matter (47.5% and 52.5% respectively).



Respondents who said they'd like more information were then asked to leave their contact details. These details have been passed onto the project team.

Minority ethnic respondents and those aged 55+ were the groups most likely to want more information (57.9% and 53.9% respectively); the least likely groups were those with a child in the household and those under 35 (41.7% and 42.2% respectively).

There was no correlation by deprivation.

### Garden waste collections

Garden waste collections are not a statutory duty for local councils to provide free of charge. The pressures of COVID 19, and current availability of HGV drivers nationally, has meant a number of delays to collections over the past 18 months. We thank you for your continued patience.

We provide a garden waste collection for grass cuttings, non-invasive weeds, trimmings and foliage. However, we regularly find items such as general waste, green recycling bags, garden furniture and nappies when the garden waste load is being processed. In 2019/20, it cost the Council £95,000 to process incorrect material from within our garden waste collections.

From analysis, we know that on the whole, incorrect material is coming from areas that use green wheeled bins. Incorrect material is being 'hidden' at the bottom of the bins, so our collection crews are unable to reject the bin for collection.

We need to consider all options to improve this situation, and we would like to understand your views.

Do you use your garden waste collection?

Over four in five (86.3%) respondents use the garden waste collection.

	No.	%
Yes	2,685	86.3
No	426	13.7
Total Respondents	3,111	100.0

Over nine tenths (92.4%) of respondents aged 55+ use their garden waste collection, this compares with less than two thirds (62.3%) of those aged under 35.

Seven in ten (70.4%) respondents from the most deprived areas use their garden waste collection, this rises to almost all (97.4%) when viewed by respondents from the least deprived areas.

Almost all respondents who live in a detached or semi-detached property (97.3% and 96.3% respectively) use their garden waste collection; this drops to just over one in three (34.5%) when viewed by those that live in a Flat, Maisonette, Bedsit, Studio or Room only.

**Respondents who indicated that they use the service were then asked a few additional questions in relation to the service.**

Which of these do you use for your garden waste collections?

The majority (90.1%) of respondents who use the garden waste collection, use a green wheeled bin. Around one in ten (9.7%) use white re-useable sacks.

5 (0.2%) respondents stated that they don't use a garden waste container.

	No.	%
Green wheeled bin	2,412	90.1
White re-useable sacks	259	9.7
I don't use a garden waste container	5	0.2
Total Respondents	2,676	100.0

The use of '**White re-useable sacks**' was highest amongst respondents who reside in the southern arc of the city and those aged under 35 (23.1% and 16.3% respectively).

The '**Green wheeled bin**' was used by over four in five (85.2%) of respondents who reside in the most deprived areas of Cardiff. However, this increases to almost all (99.6%) when viewed by respondents from the least deprived areas.

Almost all respondents who live in a detached or semi-detached property (99.1% and 97.6% respectively) use a '**Green wheeled bin**'.

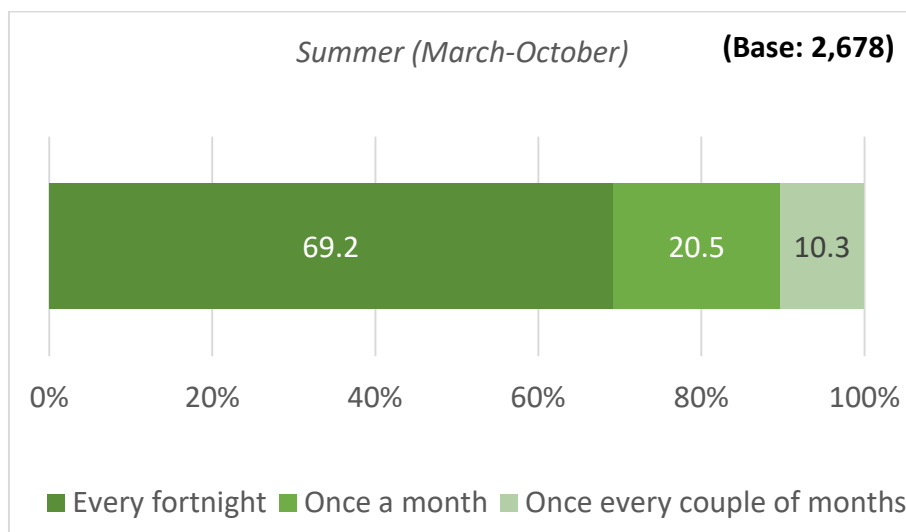
Just over three in ten (31.1%) respondents who live in a Terraced property use '**White re-useable sacks**'

If you use your garden waste collection, how often do you put your garden waste out for collection?

Respondents who indicated that they use the garden waste collection service were asked how frequently they used this service in the summer versus the winter.

*Summer (March-October)*

Seven in ten (69.2%) respondents use the service every fortnight in the summer.



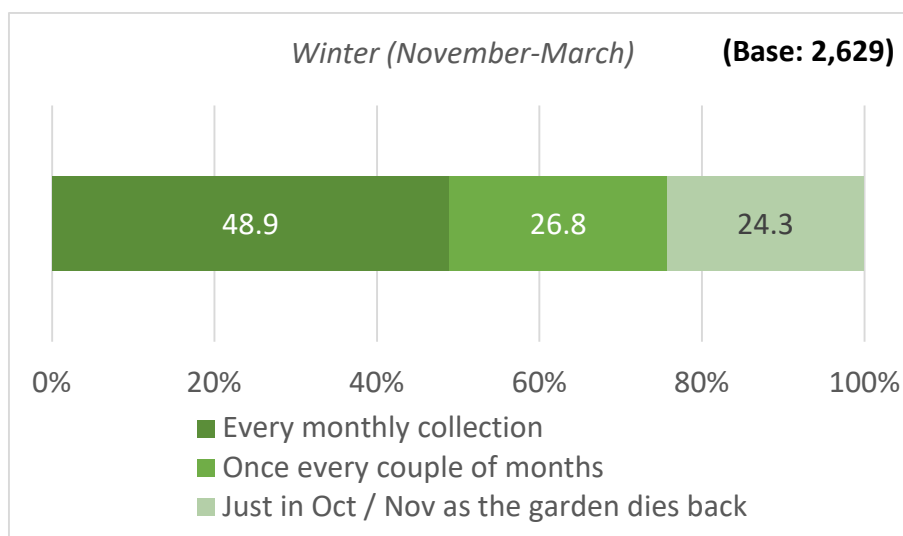
Over three in four (76.8%) respondents aged 55+ put their garden waste out every fortnight in the summer months, this compares with less than a half (48.3%) when viewed by respondents aged under 35.

Just over four fifths (81.4%) of respondents who reside in the least deprived areas of Cardiff put their garden waste out every fortnight in the summer, this drops to less than three in five (57.1%) when viewed by those that reside in the most deprived areas.

Over four in five (84.8%) respondents who live in a Detached property use the garden waste collection every fortnight in the summer months; this drops to less than a half of respondents who reside in a Flat, Maisonette, Bedsit, Studio or Room only or a Terraced property (45.0% and 46.8% respectively).

*Winter (November-March)*

Three quarters (75.7%) use the service regularly during the winter months, this includes around a half (48.9%) that use the service every month in the winter.



Respondents aged 55+ (55.4%) were the group most likely to use the service every month; least likely were those aged under 35 (30.3%).

Three in ten (30.9%) respondents in the most deprived areas stated that they use the service every month, this level of use more than doubles amongst respondents from the least deprived areas (63.4%).

Two thirds (66.1%) of respondents who live in a Detached property use the garden waste collection every month in the winter months; this drops to around one in four (26.3%) respondents who reside in a Flat, Maisonette, Bedsit, Studio or Room only.

Before the challenges of the past 18 months, we would move to a monthly collection in October. We recognise from feedback that this is often too early to accommodate leaf fall, and the end of the gardening season.

If we were to provide fortnightly garden waste collections up until the end of November, do you agree that you could cope without a collection in December, January or February?

Around three in four (76.3%) respondents feel they would be able to cope without a collection in December, January or February.

	No.	%
Yes	2,023	76.3
No	628	23.7
I don't use garden waste collections	2	0.1
<b>Total Respondents</b>	<b>2,653</b>	<b>100.0</b>

Respondents who reside in the southern arc and those aged under 35 (82.6% and 80.7% respectively) were the groups most likely to cope without a collection in the winter months (December, January or February); least likely to cope were males and those from a minority ethnicity (both 74.6%).

Over four fifths (84.7%) that reside in the most deprived areas stated they could cope without a collection in the winter months; this response drops to seven in ten (70.9%) for respondents in the least deprived areas.

Only two thirds (67.0%) of those that reside in a detached property agreed that they could cope without a collection in the winter months.

Councils in Wales currently charge for the collection of garden waste. By charging for the collection of garden waste, on a subscription basis, Councils are able to ensure they are only visiting the properties that need a collection. This makes collections more efficient (and more environmentally friendly) and provides a better service for residents with a reduction in potential delays to the service. In Cardiff, we visit 135,000 households over a fortnight, but we know that on average across the City, only 12% of properties put out their bin every collection. This reduces to 2% over the winter months.

Do you think we should introduce an annual charge of £35 for fortnightly garden waste collections, between March-November? This would be approximately £1.80 per collection. Residents would need to sign up and pay each year.

Four in five (79.4%) respondents disagree with the suggestion of introducing an annual charge of £35 for a fortnightly garden waste collection.

	No.	%
Yes	633	20.6
No	2,441	79.4
Total Respondents	3,074	100.0

Agreement was highest amongst respondents aged under 35 and those from a minority ethnicity (27.3% and 24.4% respectively); it was lowest amongst respondents who identify as disabled and those that have a child in the house (17.8% and 19.6% respectively).

There was no correlation by deprivation.

Respondents living in a Flat, Maisonette, Bedsit, Studio or Room were more than twice as likely to agree than those living in a semi-detached property (37.0% 17.5% respectively).

If you have said yes, why?

**'I would rather pay for a kerbside collection than have to take my garden waste elsewhere'** was cited by three in five (60.7%) respondents who would be happy to pay an annual charge. This was followed by **'Not everyone has garden waste at their properties, so those who do should pay for a collection'** (55.6%) and **'It would make collections more efficient'** (42.8%).

Although viewed as the least likely reason why respondents would pay for this service, over one in three (35.7%) said '**It's not a statutory service, so I'd like to see money invested in other services rather than garden waste collection**'.

	No.	%
I would rather pay for a kerbside collection than have to take my garden waste elsewhere	383	60.7
Not everyone has garden waste at their properties, so those who do should pay for a collection	351	55.6
It would make collections more efficient	270	42.8
It's not a statutory service, so I'd like to see money invested in other services rather than garden waste collections	225	35.7
Other	35	5.5
Total Respondents	631	-

*N.B. Percentages total more than 100% as respondents could select more than one option*

If other, please specify:

Respondents who selected 'Other' had their comments grouped into themes. The top three themes, along with example comments can be viewed below and overleaf. A full breakdown can be viewed in Appendix H.

Theme	No.	%	Example Comments
Could incentivise composting	10	28.6	<ul style="list-style-type: none"> <li>• It might encourage people to compost their own garden waste.</li> <li>• If people have gardens should there be an initiative to encourage them to compost rather than fill garden waste bins maybe that's an option provide them with a composted if they pay for pickups.</li> <li>• That would encourage composting — which is what I do. I do actually use the. garden waste collection about twice a year, if that.</li> <li>• To encourage. composting — which is what I do with nearly all my garden waste.</li> </ul>
Happy to pay	7	20.0	<ul style="list-style-type: none"> <li>• I have garden waste all year round and happy to pay for extra collections.</li> <li>• The current service is hit and miss, with many missed collections and large gaps. As a paid for service, I would expect the quality of service to have to improve.</li> <li>• I previously lived in Cheltenham and an annual charge worked well.</li> </ul>

Would want more collections if paying	6	17.1	<ul style="list-style-type: none"> <li>To be specific if I pay a fee, I expect collections to occur over winter as well just less regularly. It's a non-statutory service and I understand the council needs to invest money elsewhere. If the charge was anymore, I wouldn't be happy at all. Also just to note I think this has the potential to make garden waste recycling class divide.... Had the social implications been considered for charging?</li> <li>To make sure it is taken - fed up with being missed.</li> </ul>
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If you have said no, why?

**'It should be covered by my Council Tax'** (68.5%) was viewed as the main reason why respondents don't think there should be an annual charge, this was followed by **'The material should be collected for free, as it contributes towards recycling rates'** (52.3%) and **'I could not afford this fee'** (20.7%).

183 (7.5%) respondents said **'I would rather take my garden waste to a Household Recycling Centre for free'**

	No.	%
It should be covered by my Council Tax	1,670	68.5
The material should be collected for free, as it contributes towards recycling rates	1,275	52.3
I could not afford this fee	504	20.7
I don't have enough garden waste to pay for collections	503	20.6
I would just use my black bin/red striped bags	235	9.6
I would rather take my garden waste to a Household Recycling Centre for free	183	7.5
Other	349	14.3
Total Respondents	2,438	-

*N.B. Percentages do not total 100% as respondents could select multiple options*

If other, please specify

Respondents who selected 'Other' had their comments grouped into themes. The top three themes, along with example comments can be viewed below. A full breakdown can be viewed in Appendix I.

Theme	No.	%	Example Comments
May increase fly tipping / burning / incorrectly presented waste / using other receptacles	137	39.5	<ul style="list-style-type: none"> <li>• It will result in waste being fly tipped.</li> <li>• I worry that people may just dump this waste instead or put in black bags.</li> <li>• I would not mind paying the fee but think it would encourage some people not to recycle green waste and burn it or put it in black bin. You could have a free opt-in service in which people have to register every year if they want collections.</li> <li>• It will probably just get fly tipped somewhere if there is a charge.</li> <li>• Will lead to people burning garden waste I'm their garden which will increase CO2.</li> </ul>
Pay enough council tax at present	58	16.7	<ul style="list-style-type: none"> <li>• I feel I pay enough for my council tax.</li> <li>• My council tax is already inflated enough, and I should get at least some services for my payment.</li> <li>• Refuse collection is the ONLY obvious service we get from the council for the extortionate council tax we already pay.</li> </ul>
Not prepared to pay	50	14.4	<ul style="list-style-type: none"> <li>• Cardiff residents would not pay for their collections, the majority believe that they pay their Council tax and the only service they receive is their waste collections, so asking them to pay more will not go down well.</li> <li>• I wouldn't want to pay for fortnightly collections when I didn't need them that often - an option to pay for a single collection would be preferable, and pinpoint collection locations too.</li> <li>• If you start charging for his service a lot of people will not pay and will just start dumping elsewhere. It should already be included in the extortionate council tax that we already pay.</li> </ul>

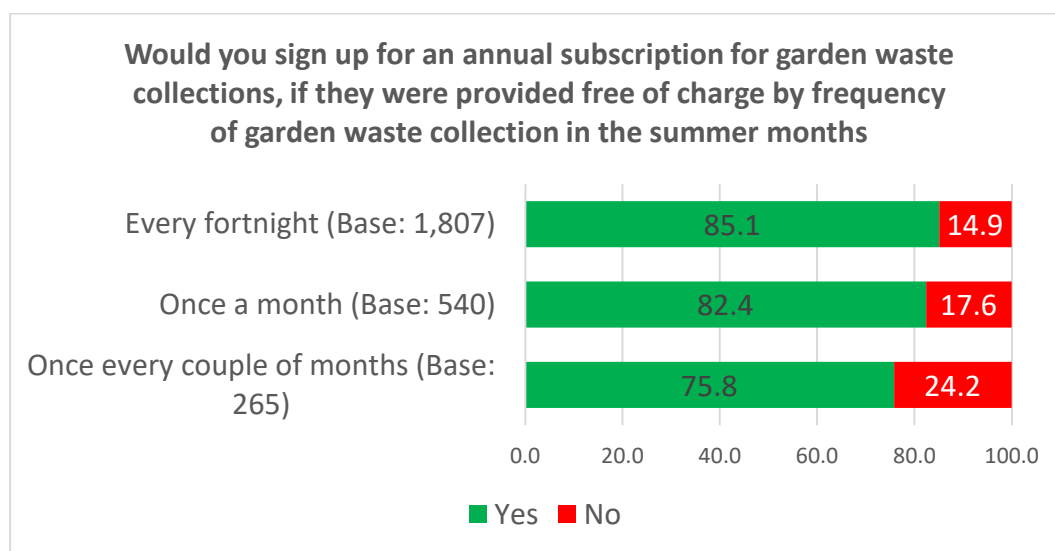


Would you sign up for an annual subscription for garden waste collections, if they were provided free of charge? If you did not sign up, you would not receive a garden waste collection at the kerbside

Over three quarters (77.4%) of respondents would sign up for a free annual subscription for garden waste collections.

	No.	%
Yes	2,348	77.4
No	684	22.6
Total Respondents	3,032	100.0

The willingness to sign up for an annual subscription rises to over four fifths when viewed by those respondents who use the garden waste collection fortnightly or monthly in the summer (85.1% and 82.4% respectively).

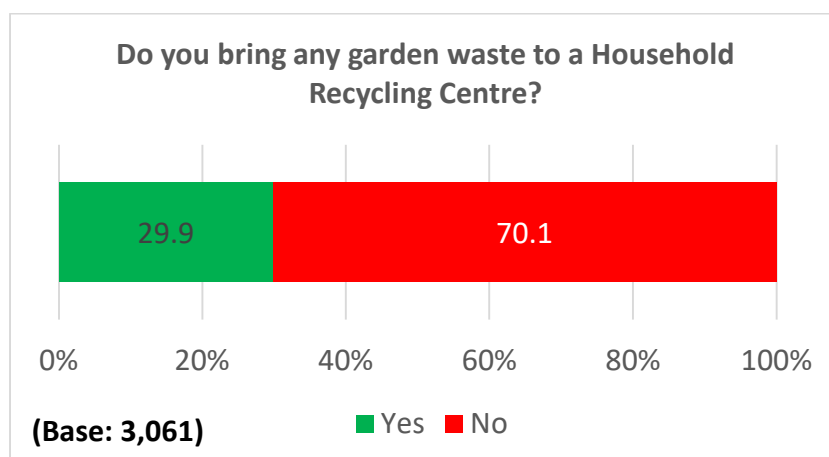


Respondents with a child in the house and females were the groups most likely to sign up for an annual subscription (83.2% and 81.2% respectively); least likely were respondents who identify as disabled and those aged under 35 (70.1% and 70.3% respectively).

Just over seven in ten (72.0%) of respondents residing in the most deprived areas of Cardiff would sign up for an annual subscription; this increases to over four fifths (83.7%) when viewed by respondents from the least deprived areas.

Do you bring any garden waste to a Household Recycling Centre?

Three in ten (29.9%) respondents take garden waste to a Household Recycling Centre.



Respondents with a child in the house and those who identify as disabled were the two groups most likely to take garden waste to a Household Recycling Centre (33.9% and 33.2% respectively).

There was no correlation by deprivation.

If no, why?

Respondents who don't take any garden waste to a Household Recycling Centre were asked to explain why.

**'I don't have any extra garden waste'** (36.5%) was viewed as the main reason, this was followed by **'I feel it should be collected from the kerbside'** (32.9%) and **'I don't want to take the material in the car, as it can make the car dirty'** (25.4%).

	No.	%
I don't have any extra garden waste	780	36.5
I feel it should be collected from the kerbside	704	32.9
I don't want to take the material in the car, as it can make the car dirty	542	25.4
I can't take it in my wheeled bin, and don't have a different container to transport it	465	21.7
Not physically able to	400	18.7
I can't access a Household Recycling Centre, as I don't have a car	304	14.2
Other	290	13.6
Total Respondents	2,138	-

*N.B. Percentages total more than 100% as respondents could select more than one option*

If other, please specify:

Respondents who selected 'Other' had their comments grouped into themes. The top three themes, along with example comments can be viewed below. A full breakdown can be viewed in Appendix I.

Theme	No.	%	Example Comment
Lack of Household Recycling Centre's in Cardiff / Environment Concerns / Distance and time needed to travel	119	41.3	<ul style="list-style-type: none"> <li>• There is no local hwrc in the north of Cardiff ridiculous to expect people to drive across the city to dispose of it</li> <li>• The recycling centre is some distance now that Wedal Road is closed - using a car for this purpose is contradictory to the Council's greener city policy</li> <li>• I live in North Cardiff and the nearest centre is over 10 miles away, which I vehemently disagree with for both time and environmental reasons. There should be a recycling facility for north Cardiff.</li> <li>• You want us to travel miles across the city with a car full of stinking garden waste because you have closed Wedal Road and Waungron for us Cardiff North residents...pull the other one.</li> <li>• I am sure that 200+ cars travelling to the recycle centre produced more carbon dioxide that kerb collections</li> <li>• It's very difficult to get to the tip from here, right across the other side of Cardiff. If there was a collection point closer, I might use it</li> </ul>
Use home composter	39	13.5	<ul style="list-style-type: none"> <li>• We are lucky enough to have a garden and allotment. We use as much of our garden waste as possible to compost</li> <li>• I don't have much and i turn it all into compost. Good for the flowers see butty</li> <li>• I compost at home using a council supplied top load bottom output compost bin</li> <li>• I don't have to, I am able to compost</li> </ul>
Minimal / No Garden Waste	36	12.5	<ul style="list-style-type: none"> <li>• No garden waste - live in a flat</li> <li>• I don't have a garden.</li> <li>• I have Astro turf and patio, so no garden waste</li> <li>• Not enough waste to worry about</li> </ul>

Half (50.4%) of respondents aged under 35 claimed the reason the reason they don't take garden waste to a Household Recycling Centre was due to the fact '***I don't have any extra garden waste***'; this reason is lowest amongst respondents who identify as disabled (29.4%).

One in four respondents who reside in the Southern Arc, and one in four of those who identify as disabled (25.3% and 25.0% respectively) **'Feel it should be collected from the kerbside'**; amongst male respondents this figure rises to 36.5%.

Over one in three (34.9%) respondents who have a child in the household cited **'I don't want to take the material in the car, as it can make the car dirty'**.

**'I can't take it in my wheeled bin, and don't have a different container to transport it'** was of most concern to respondents with a child in the household (26.7%); concern was lowest amongst those that reside in the southern arc (17.1%).

Respondents aged over 55 were more almost three times as likely to cite **'Not physically able to'** when compared to those aged under 35 (24.0% and 8.3% respectively).

Almost one in four (23.4%) respondents from the most deprived areas cited **'I feel it should be collected from the kerbside'**; this rises to 37.3% when viewed by respondents from the least deprived areas.

Around one in twenty (4.6%) respondents from the least deprived areas highlighted **'I can't access a Household Recycling Centre, as I don't have a car'**. By contrast, this rises sharply to three in ten (29.7%) respondents from the most deprived areas.

If you weren't sure whether an item should be included in your garden waste collections, what would you be most likely to do with it?

Two in five (39.1%) respondents would **'Make every effort to find out how to recycle it'** if they were unsure whether an item could be included in the garden waste collections or not. A further one in three (33.4%) would **'Put it in my black bin / red striped bag'**, whilst almost one in six (17.2%) would **'Take it to a Household Recycling Centre'**

23 (0.8%) respondents indicated that they would **'Hide it in the green bin / white re-useable sack'**.

	No.	%
Make every effort to find out how to recycle it	1,179	39.1
Put it in my black bin/red striped bag	1,005	33.4
Take it to a Household Recycling Centre	517	17.2
I don't know	188	6.2
Hide it in the green bin/white re-useable sack	23	0.8
Other	100	3.3
Total Respondents	3,012	100.0

If other, please specify:

Respondents who selected 'Other' had their comments grouped into themes. The top three themes, along with example comments can be viewed below. A full breakdown can be viewed in Appendix J.

Theme	No	%	Example Comment
Compost it	23	24.7	<ul style="list-style-type: none"> <li>• Make use of it in the garden or compost it</li> <li>• I have a compost bin in the garden.</li> <li>• Use my allotment compost bins</li> <li>• composting as much as possible</li> </ul>
Green bin/ Confident what can go in garden waste collections	22	23.7	<ul style="list-style-type: none"> <li>• I know what can go in a green bin</li> <li>• Personally, I'm pretty clear about what is / isn't permitted so don't face that dilemma.</li> <li>• As a gardener I know what can be recycled</li> <li>• I know what goes in Garden waste, so it isn't an issue</li> </ul>
Look it up / Ask Friends / Neighbours	16	17.2	<ul style="list-style-type: none"> <li>• check Council website. Ask family/ friends</li> <li>• Attempt to get clarification from Council.</li> <li>• Ask manager of property where I live</li> </ul>

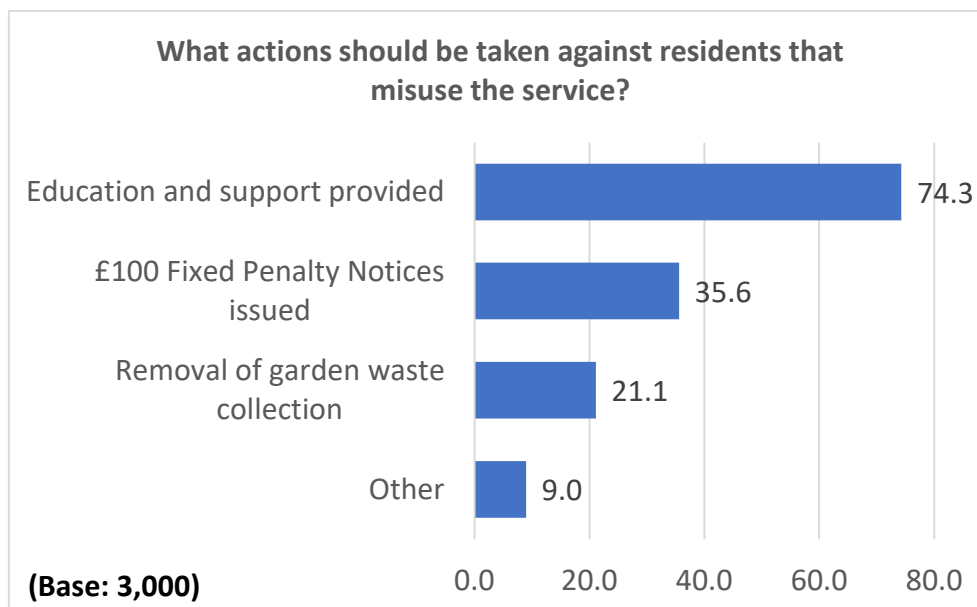
Respondents aged 55+ and those that identify as disabled (both 41.4%) were the groups most likely to '**Make every effort to find out how to recycle it**'; least likely were those aged under 35 (28.3%).

'**I don't know**' was selected by around one in twenty (4.8%) respondents aged 55+; this more than doubles when viewed by respondents aged under 35 (12.0%).

There was no correlation by deprivation.

What actions should be taken against residents that misuse the service?

The majority (74.3%) of respondents felt that '**Education and support provided**' would be the most appropriate form of action taken against people who misuse the service. Over one in three (35.6%) cited '**£100 fixed penalty notices issued**', whilst around one in five (21.1%) think the '**Removal of garden waste collection**' is the best way to deal with the issue.



*N.B. Percentage do not total 100% as respondents could select multiple options*

If other, please specify:

Respondents who selected 'Other' had their comments grouped into themes. The top three themes, along with example comments can be viewed below and overleaf. A full breakdown can be viewed in Appendix L.

Theme	No.	%	Example Comments
Greater implications for repeat offenders	80	31.9	<ul style="list-style-type: none"> <li>• Possibly a sliding scale if education doesn't work. Possibly told x number of times, then fine and removing service.</li> <li>• By all means education and support, but penalty for repeat 'offenders'.</li> <li>• Needs a phased approach, starting with education escalating to fines and ending with a temporary removal of services. But to be effective needs to be tailored to individual needs. Probably not an affordable solution though.</li> <li>• Warnings to be given in that order, education, fine and removal of service if continued rule breaking.</li> </ul>
Nothing	39	15.5	<ul style="list-style-type: none"> <li>• No action should be taken as fly tipping is a bigger costly problem.</li> </ul>

			<ul style="list-style-type: none"> <li>• The council should accept some errors.</li> <li>• Nothing - do not always look for an opportunity to fine or remove services.</li> </ul>
Concerns around identifying the correct households / individuals	26	10.4	<ul style="list-style-type: none"> <li>• I have seen children put litter in garden waste bins as they walk to or from school.</li> <li>• Investigate why an item is there - it could be from a neighbour.</li> <li>• My concern with fixed penalty notices in general is that 3rd parties could contaminate someone's perfectly acceptable waste caddy/bag/whatever as they pass by or even maliciously. Stopping waste collections due to the thoughtlessness of individuals who hide other material in bins/bags affects the majority who are not at fault.</li> </ul>

**'Education and support provided'** was viewed as the most desirable form of action that should be taken against people who misuse the service across each of the demographic / geographic and deprivation groups analysed.

Two in five respondents aged under 35 and those that reside in the southern arc (39.4% and 39.3% respectively) would like to see a **'£100 Fixed Penalty Notices issued'**.

## Section 2 - Increase recycling participation and capture of priority materials

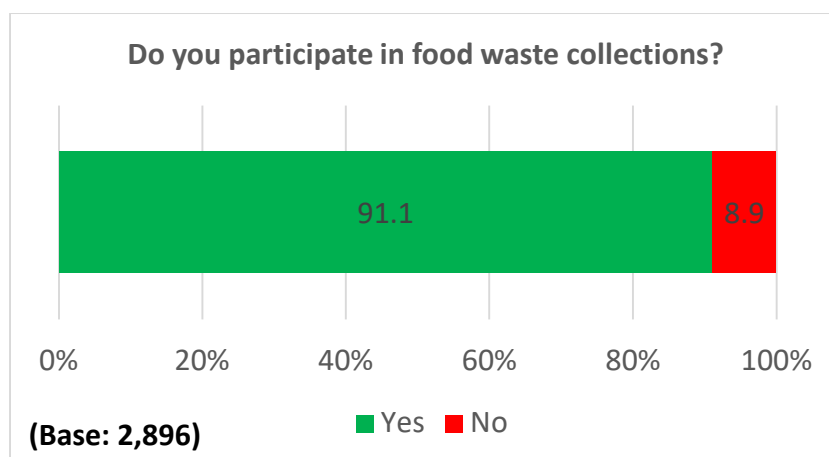
In Cardiff, we are currently recycling 58% of our material. This falls short of our statutory target of 64% and we are not seeing the year-on-year increases required to meet 70% recycling by 2025.

We know there is more we can do, improving recycling rates not just from households, but also looking at other operations. For example, our trade waste collections, household recycling centres and street cleansing.

But we also need your help. Despite offering weekly collections of food waste, we know that 30% of the waste within black bins/red striped bag is still made up of both avoidable, and unavoidable, food waste. If we could divert all food waste into the weekly food collection, we could see a performance increase of around 2%! You can put all sorts of food in your caddy. This includes bones, tea bags, coffee grounds and leftovers.

Do you participate in food waste collections?

Over nine in ten (91.1%) respondents indicated that they participate in food waste collections.



Respondents with a child in the household and those from a minority ethnicity were most likely to participate (94.3% and 92.5% respectively).

Participation varied from 87.6% in the most deprived areas of Cardiff, to 93.4% in the least deprived areas.

Participation was highest amongst those that live in a detached property (93.0%); this drops to less than four fifths (78.7%) when viewed by respondents who live in a Flat, Maisonette, Bedsit, Studio or Room only.



If you do participate in food waste collections, how often do you put your kerbside caddy out for collection?

Of the respondents who do participate in food waste collections, the vast majority do so every week (95.0%).

	No.	%
Every week	2,492	95.0
Every fortnight	87	3.3
Less often	42	1.6
I don't take part in food waste collections	1	0.0
<b>Total Respondents</b>	<b>2,622</b>	<b>100.0</b>

Over four fifths of all demographic and geographical groups analysed stated that if they do participate, that they do so every week; the highest proportion was seen by respondents who have a child in their household (97.4%).

At least nine tenths of all deprivation groups indicated that they participate every week.

If no, why not?

Respondents who don't participate were asked to explain why.

'**I home compost**' (39.1%) was seen as the main reason why respondents don't participate. This was followed by '**I don't waste any food**' (33.6%) and '**It's dirty / unhygienic**' (20.7%).

	No.	%
I home compost	100	39.1
I don't waste any food	86	33.6
It's dirty / unhygienic	53	20.7
I can put it into my black bin outside, where it won't smell	38	14.8
I live in a flat, and there is no food waste collection	26	10.2
Don't have the equipment I need	10	3.9
Other	47	18.4
<b>Total Respondents</b>	<b>256</b>	<b>-</b>

*N.B. Percentages total more than 100% as respondents could select more than one option*

If other, please specify:

Respondents who selected 'Other' had their comments grouped into themes. The top three themes, along with example comments can be viewed below. A full breakdown can be viewed in Appendix M.

Theme	No.	%	Example Comments
Hygiene / Vermin concerns	13	28.3	<ul style="list-style-type: none"> <li>• There is a massive rat problem in my area, and it was attracting even more as waste container is kept outside in communal area.</li> <li>• Attracts flies.</li> <li>• By the time I generate enough to fill a caddy it is rotting and unhygienic.</li> <li>• Encourages flies and rats.</li> </ul>
Have a waste disposal unit / compost it	12	26.1	<ul style="list-style-type: none"> <li>• I use a sink waste disposal unit for small items and only use the council system for such a bones. I try not to waste food.</li> <li>• I have a sinkerator for non-compostable food waste and a compost heap.</li> <li>• I have a waste disposal unit in my sink.</li> <li>• We have a dog who has learned how to get into the food bin. I home compost.</li> </ul>
Don't generate enough food waste	6	13.0	<ul style="list-style-type: none"> <li>• I do not waste enough food to warrant collecting. It would take months to produce one bagful.</li> <li>• I have minimal food waste. If required (very, very occasionally) I can use my waste disposal unit.</li> <li>• As I live alone, I find I produce very little food waste and it is just a little too much hassle for me to worry about. In the black bin it goes.</li> </ul>

What would encourage you to participate, or participate more regularly in food waste collections?

The majority (85.7%) of people responded '**Nothing – I already take part weekly, and could do no more**'.

114 (4.1%) respondents cited '**Understanding the benefits of participating, for example the carbon impact**'.

	No.	%
Nothing- I already take part weekly, and could do no more	2,401	85.7
Understanding the benefits of participating, for example the carbon impacts	114	4.1
Receiving a kitchen caddy or kerbside caddy	90	3.2
More information and education provided about how to take part in the service	71	2.5
Risk of receiving a £100 Fixed Penalty Notice if I don't take part	36	1.3
Reduced black bin/red striped bag collections e.g. moving to a 3 weekly collection/reducing bin size/limiting to 2 red striped bags per collection	19	0.7
Something else	181	6.5
Total Respondents	2,801	-

*N.B. Percentages do not total 100% as respondents could select more than one option*

If something else, please specify:

Respondents who selected 'Other' had their comments grouped into themes. The top three themes, along with example comments can be viewed below and overleaf. A full breakdown can be viewed in Appendix N.

Theme	No.	%	Example Comments
Don't generate enough food waste / Compost what I have	59	33.7	<ul style="list-style-type: none"> <li>• If I was not living alone and generated enough food waste, I would use the service.</li> <li>• I have very little food waste. I compost any peelings.</li> <li>• We strive to avoid food waste in the first place and generally produce the minimum of food waste. Peelings etc. go onto our own compost bin.</li> <li>• I compost my own food waste so only need a fortnightly collection.</li> <li>• We waste so little food that the caddy was horribly smelly by the time it needed emptying.</li> </ul>

<p><b>Improved Caddy Design - Larger / Lockable</b></p>	<p>29</p>	<p>16.6</p>	<ul style="list-style-type: none"> <li>• Improved design of caddies e.g. ones that actually lock and can't be broken into by seagulls, causing mouldy bread to be scattered everywhere.</li> <li>• Bigger kerbside caddy - as a family of 6 we offer have no room left on day 5, so up end storing a bag until collected and hoping the next week is less wasteful.</li> <li>• A 30% increase in kerbside caddy capacity.</li> <li>• Food caddy is too small and the lids aren't very well fitting which allows for flies and maggots in the hot weather.</li> </ul>
<p>Concerns around collections / Bin men</p>	<p>21</p>	<p>12.0</p>	<ul style="list-style-type: none"> <li>• Have the bin men actually collect them and also not throw the caddy's down the street.</li> <li>• Actually collecting the caddy's would be a good start!</li> <li>• The council to actually empty the communal food bin.</li> </ul>

**'Nothing - I already take part weekly and could do no more'** was cited by at least three quarters of respondents from all demographic and geographical groups analysed and was selected by at least four fifths of respondents from each deprivation group.

Around one in eleven (8.7%) respondents aged under 35 claimed that **'Understanding the benefits of participating, for example the carbon impacts'** would encourage them to participate / participate more regularly in food waste collections, this is more than double that of those aged 55+ (3.2%).

**'More information and education provided about how to take part in the service'** was highest by respondents who identify as disabled and those from a minority ethnicity (6.1% and 5.7% respectively); it was lowest by respondents aged 55+ and those with a child in the household (both 2.1%). Around one in twenty (5.6%) respondents from the most deprived areas selected this option; this was three times more than respondents from the least deprived areas (1.7%).

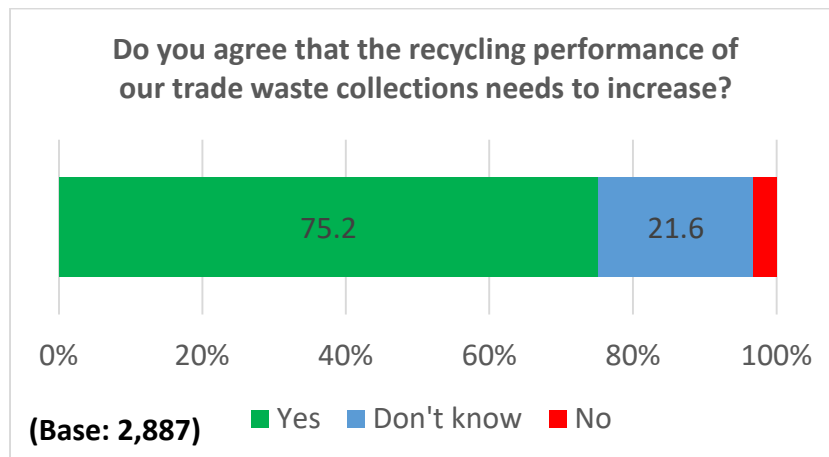
Respondents aged under 35 were twice as likely as their counterparts aged 55+ to participate more if there was a **'Risk of receiving a £100 Fixed Penalty Notice if I don't take part'** (1.9% and 0.8% respectively).

### Improving recycling participation in businesses

Cardiff Council's trade team collects recycling and waste from over 3,000 businesses in the City. The team offers collections of all recyclable materials, including food waste, paper, glass and cardboard. Despite this, recycling performance is at 40%.

Do you agree that the recycling performance of our trade waste collections needs to increase?

Three in four (75.2%) respondents agree that the recycling performance of our trade waste collections needs to increase.

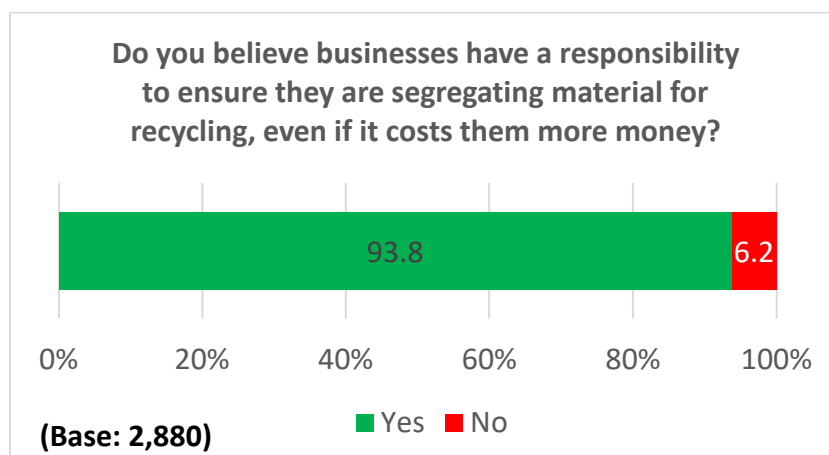


Agreement was highest amongst respondents aged under 35 and females (84.9% and 78.7% respectively); it was lowest by respondents aged 55+ and males (70.9% and 71.3% respectively).

There was no correlation by deprivation.

Do you believe businesses have a responsibility to ensure they are segregating material for recycling, even if it costs them more money?

The majority (93.8%) of respondents believe businesses have a responsibility to ensure they are segregating material for recycling, even if it costs them more money.



At least nine tenths of all demographic and geographical groups analysed agree that businesses have a responsibility to ensure they are segregating material for recycling, even if

it costs them more money. Agreement was highest amongst female respondents and those aged under 35 (95.2% and 94.3% respectively).

At least nine tenths of all deprivation groups agreed.

### Household Recycling Centres

We are now recycling over 80% of material at our Household Recycling Centres. This improvement is due to the improved controls, including the booking in system which has deterred traders from illegally disposing of material, and the strong "No mixed waste" policy now being applied to all users. We thank all residents for embracing these controls and making our Household Recycling Centres one of the best performing within Wales.

Do you use Household Recycling Centres?

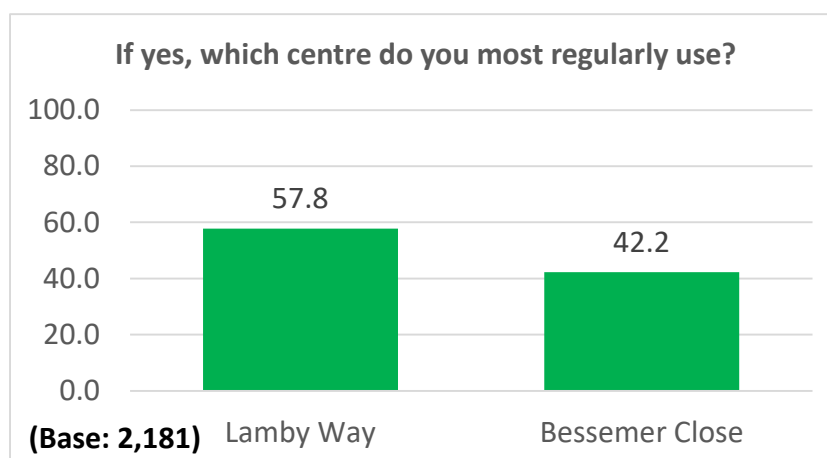
Around three in four (76.9%) respondents use a Household Recycling Centre.

	No.	%
Yes	2,213	76.9
No	666	23.1
Total Respondents	2,879	100.0

Respondents with a child in the household and males were viewed as the two groups most likely to use Household Recycling Centres (85.4% and 78.4% respectively); the least likely were those that identify as disabled and those from a minority ethnicity (61.8% and 64.5% respectively).

If yes, which centre do you most regularly use?

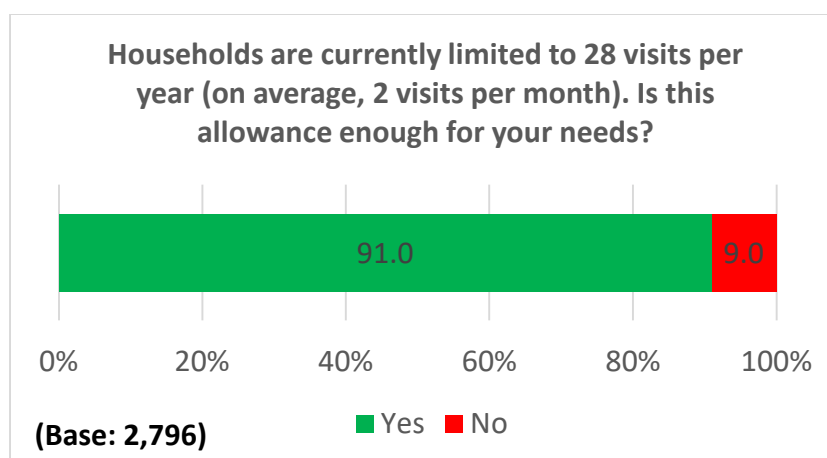
The centre at Lamby Way was found to be more regularly used than the centre at Bessemer Road (57.8% and 42.2% respectively).



Households are currently limited to 28 visits per year (on average, 2 visits per month).

Is this allowance enough for your needs?

Over nine tenths (91.0%) of respondents feel that the current allowance is sufficient.



Agreement was highest amongst females and those aged 55+ (91.9% and 91.4% respectively). However, this drops to four fifths (80.9%) when viewed by respondents who identify as disabled.

Over four fifths of all deprivation groups analysed agreed that the current allowance is sufficient.

Are there any further improvements you would like to see at the Household Recycling Centres?

Respondents were provided with a list of pre-coded options and asked which, if any, Household Recycling Centre improvements they'd like to see.

**'More Household Recycling Centres in Cardiff'** (57.3%) was considered the key improvement respondents would like to see. This was followed by **'Increased opportunities to donate items to be re-used'** (51.7%) and **'Removal of the pre booking system'** (41.6%).

Around one in thirteen (7.8%) cited **'Improved layout'**

	No.	%
More Household Recycling Centres in Cardiff	1,489	57.3
Increased opportunities to donate items to be re-used	1,343	51.7
Removal of the pre booking system	1,080	41.6
Improved customer signage	358	13.8
Increased interaction with site attendants	293	11.3
Improved layout	202	7.8
Other	397	15.3
Total Respondents	2,598	-

*N.B. Percentages do not total 100% as respondents could select more than one option*

If other, please specify:

Respondents who selected 'Other' had their comments grouped into themes. The top three themes, along with example comments can be viewed below. A full breakdown can be viewed in Appendix O.

Theme	No.	%	Example Comments
<b>Better Accessibility</b> - Vans / Cyclists / Pedestrians	108	28.1	<ul style="list-style-type: none"> <li>• Better access for residents without cars.</li> <li>• Let cyclists with bike trailers use the centres.</li> <li>• Completely inaccessible to people without cars. People without cars are penalised yet they are taking the biggest steps for our environment. It is frustrating to be told that we need to do more ecologically when we are already making the biggest green sacrifice by not running a car and thus facilities are not available to us.</li> <li>• Allow those without cars (i.e. on bicycles) to be able to use the centres.</li> <li>• Recycling provision throughout the city is poor. Accessibility and location need to be improved.</li> </ul>
Concerns around lack of Household Recycling Centres in Cardiff	77	20.0	<ul style="list-style-type: none"> <li>• The promised recycling centre in North Cardiff.</li> <li>• Stop selling off recycling centres and replace them asap.</li> <li>• You took away the centre on wealth road and it now takes me an hour round trip if I am able to do it myself.</li> <li>• Large centre in north Cardiff not the pretend one proposed in Llanishen.</li> </ul>
Return of general waste tipping	42	10.9	<ul style="list-style-type: none"> <li>• Opportunity to throw general household waste.</li> <li>• Bring back general waste tipping. Even if for a limited amount per household. Taking the function away does not mean it ceases to exist!!</li> <li>• More scope for general non recycling waste to be taken for when you are having a sort out.</li> </ul>



Respondents aged 55+ and males (64.3% and 62.0%) were the groups most likely to want to see **'More household recycling centres in Cardiff'**; this was lowest amongst respondents who reside in the Southern Arc (40.8%).

Around one in five (21.2%) respondents aged under 35 would like to see **'Improved customer signage'**; this compares with one in eight (12.0%) respondents aged 55+.

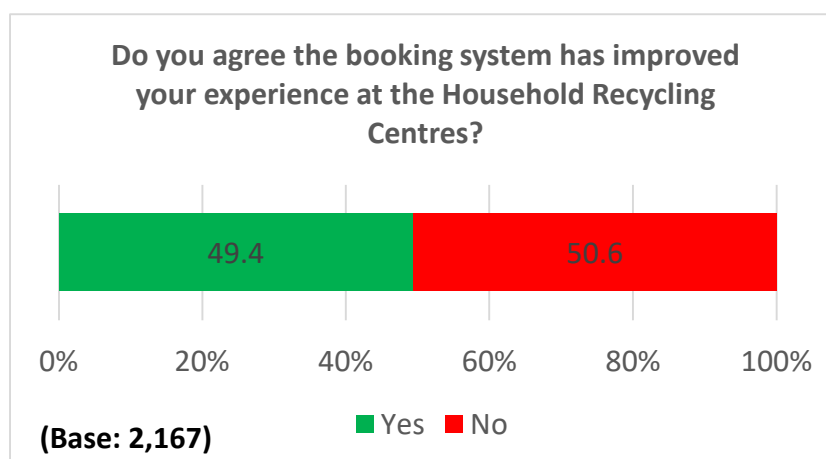
One in five (19.2%) respondents who identify as disabled would like **'Increased interaction with site attendants'**.

Over two thirds (67.9%) of respondents from the least deprived areas would like **'More household recycling centres in Cardiff'**, this drops to less than half (45.8%) of respondents from the most deprived areas.

**'Removal of the pre booking system'** was cited by just over a third (35.9%) of respondents from the least deprived areas, this rises to half (50.9%) of those from the most deprived areas.

Do you agree the booking system has improved your experience at the Household Recycling Centres?

Opinion was split (49.4% Yes / 50.6% No) as to whether the booking system has improved respondents' experiences at the Household Recycling Centre.



Agreement was highest amongst female respondents (52.8%) and lowest amongst those from a minority ethnicity (41.8%).

Over a half (51.2%) of those from the least deprived areas agreed; this drops slightly to 44.0% amongst those from the most deprived areas.

If yes, what improvements have you seen?

Overwhelmingly, respondents indicated '**Reduced traffic and waiting times**' (90.5%) as the main improvement they've seen since the introduction of the booking system. Over three fifths (63.1%) cited '**More spaces to park safely**', whilst almost half (48.0%) highlighted '**Better quality of service from recycling attendants**'

	No.	%
Reduced traffic and waiting times	951	90.5
More spaces to park safely	663	63.1
Better quality of service from recycling attendants	505	48.0
Other	24	2.3
Total Respondents	1,051	-

*N.B. Percentages do not total 100% as respondents could select more than one option*

Respondents who selected 'Other' had their comments grouped into themes. There were 2 main themes that reported from the comments; these were:

- Positive/helpful staff
- Safer/Easier/Better organised

'**Reduced traffic and waiting times**' was seen as the main improvement seen across all demographic, geographic and deprivation group analysed.

Do you have any further comments in relation to Household Recycling Centres? Please tell us:

Respondents were given the opportunity to leave any further comments they had in relation to Household Recycling Centres. The top three themes, along with example comments can be viewed below and overleaf. A full breakdown can be viewed in Appendix P.

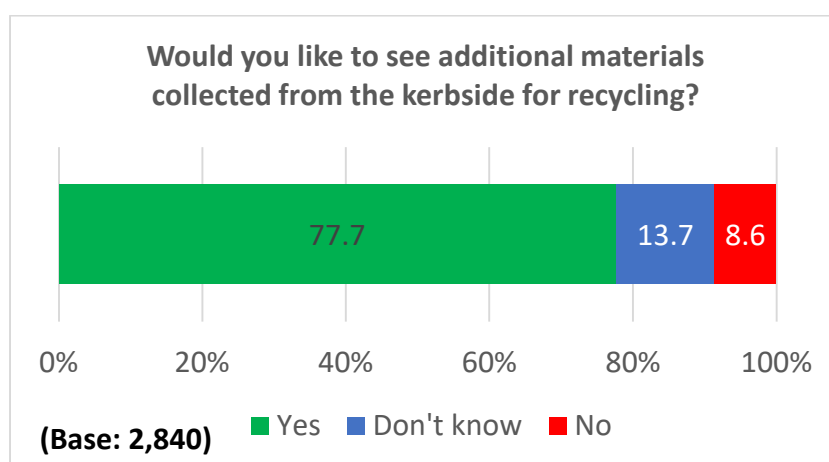
Theme	No.	%	Example Comments
Concerns around location / lack of Recycling Centres	216	28.3	<ul style="list-style-type: none"> <li>• I live in North Cardiff and am still waiting for the promised recycling centre when it was taken from Wedal Road, and we were told Lamby Way wasn't hard to travel to.</li> <li>• Need local recycling centres.</li> <li>• It is too far to travel to use the two existing HRC's. There should be a permanent HRC in North Cardiff.</li> <li>• Their current locations are not appropriate or the majority of households.</li> <li>• Lack of alternative provision when sites have been closed.</li> </ul>

<p>Positive staff / service comments</p>	<p>129</p>	<p>16.9</p>	<ul style="list-style-type: none"> <li>• The staff at the sites are always polite and very helpful.</li> <li>• The staff are brilliant and super helpful.</li> <li>• I think they are very well managed.</li> <li>• My mother really appreciated the kind help she got when she took a carload of green + wood waste. Thankyou.</li> </ul>
<p><b>Remove Restrictions -</b> Booking System / No. of site visits per year</p>	<p>119</p>	<p>15.6</p>	<ul style="list-style-type: none"> <li>• The booking system is horrendous. I think it should be removed. The ability to attend whenever you want will increase recycling and compliance.</li> <li>• The booking system is too cumbersome and time-consuming. I like to visit recycling centre spontaneously sometimes.</li> <li>• In certain situations, multiple visits per day may be required. For example house moves/clearances or major DIY projects or garden clearances.</li> <li>• Shouldn't have a limit of how many times you can visit and should remove the pre booking system.</li> </ul>

### Section 3 - Increase opportunities for communities and residents to recycle

In order to increase our recycling performance, we need to make recycling as easy and accessible as possible for our communities. WRAP's National Recycling Tracker survey 2020 identified that 15% of respondents believed that local council's do not collect enough things for recycling.

Would you like to see additional materials collected from the kerbside for recycling? Over three quarters (77.7%) of respondents would like to see additional materials collected from the kerbside collection for recycling. Less than one in ten (8.6%) stated that they wouldn't like to see additional materials collected.



Over seven tenths of all demographic and geographical groups analysed stated that they'd like to see additional materials collected from the kerbside for recycling; this was most notable by respondents aged under 35 (85.0%).

There was no correlation by deprivation.

At least three in four respondents by each household type would like to see additional materials collected from the kerbside for recycling.

If yes, what collections would you like to see offered?

Respondents who stated that they'd like to see additional materials collected were then presented with a list of pre-coded options and asked to indicate which of these additional materials they'd like to see collected.

Seven in ten respondents would like to see '**Small electoral items**' and/or '**Soft plastics**' collected (70.9% and 70.6% respectively).

A further two thirds would like to see '**Tetra Pak (Cartons)**' and/or '**Household batteries**' collected (66.9% and 66.8% respectively)

	No.	%
Small electrical items	1,557	70.9
Soft plastics	1,550	70.6

Tetra Pak (cartons)	1,470	66.9
Household batteries	1,468	66.8
Textiles	1,309	59.6
Coffee pods	595	27.1
Other	202	9.2
Total Respondents	2,197	-

*N.B. Percentages do not total 100% as respondents could select more than one option*

If other, please specify:

Respondents who selected 'Other' had their comments grouped into themes. A full breakdown can be viewed below.

Item	No.	%
Anything / Everything	24	12.1
<b>Plastic food packaging</b> - Crisp packets / Cereal bags / plastic wrapping	24	12.1
Polystyrene / Bubble wrap / Foams	22	11.1
<b>Bulky Items</b> - Fridge / Freezer / Washing Machine / Beds / Furniture	20	10.1
Hard plastics	16	8.1
Metals	12	6.1
Wood	10	5.1
Pet food pouches	9	4.5
Paint pots	9	4.5
Cooking oil	8	4.0
Paper / Books / Cardboard	8	4.0
Plastic / Polythene bags	7	3.5
Light Bulbs	6	3.0
<b>Blister Packs</b> - Tablets / Contact lenses	6	3.0
Animal waste	5	2.5
Aluminium / Tin foil	5	2.5
Clothes / Shoes	4	2.0
Terracycle	3	1.5
Misc.	29	14.6
<b>Total Respondents</b>	<b>198</b>	<b>-</b>

*N.B. Percentages total more than 100% as respondents could select more than one option*

Around four fifths of respondents aged 55+ and those who identify as disabled (79.2% and 81.2% respectively) would like to see '**Small electoral items**' collected; this compares with less than three in five (57.9%) when viewed by respondents aged under 35.

Four in five (80.1%) respondents aged under 35 would like to see '**Soft plastics**' collected; this drops to less than two thirds (63.8%) when viewed by respondents aged 55+.

Around a third (34.2%) of respondents aged under 35 would like to see '**Coffee pods**' collected; this is 11.6 percentage points higher than that of those aged 55+ (22.6%).

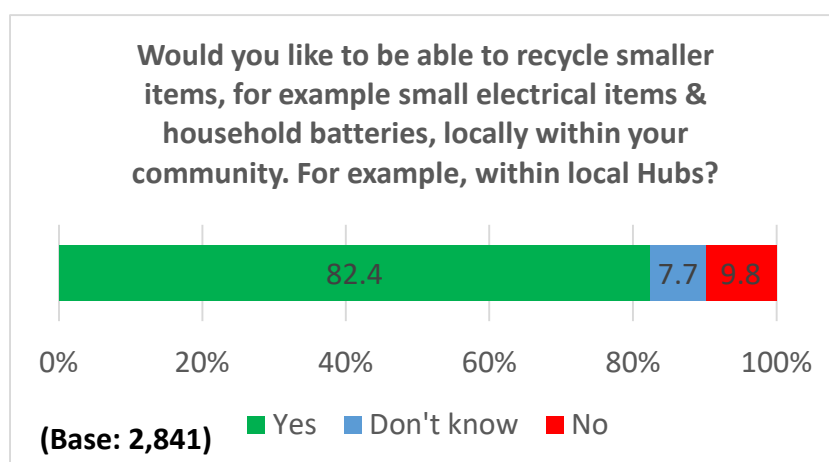
There was no correlation by deprivation.

Over two thirds of each household type would like to see '**Small electrical items**' collected.

A quarter of both semi-detached and detached property respondents (24.8% and 25.6% respectively) would like to see '**Coffee pods**' collected; this rises to over one in three (36.6%) when viewed by respondents who live in a Flat, Maisonette, Bedsit, Studio or Room only.

Would you like to be able to recycle smaller items, for example small electrical items & household batteries, locally within your community. For example, within local Hubs?

Over four fifths (82.4%) of respondents would like to be able to recycle smaller items within their community. One in ten (9.8%) stated that they'd have no interest in this scheme.



Four fifths of all demographic and geographical groups analysed would like to be able to recycle smaller items within their community; this was most notable in female respondents (85.0%).

There was no correlation by deprivation.

If yes, which items would you like to be able to recycle?

'**Small electrical items**' and '**Household batteries**' were viewed as the most popular items (86.4% and 84.7% respectively) that respondents would like to recycle in the local community (this is in line with what respondents would like to see collected from the kerbside).

Just under two thirds (64.5%) wanted to recycle '**Textiles**', whilst almost three in five (58.6%) stated they'd like to be able to recycle '**Soft plastics**'.

	No.	%
Small electrical items	2,017	86.4
Household batteries	1,976	84.7
Textiles	1,506	64.5
Soft plastics	1,367	58.6
Tetra Pak (cartons)	1,282	54.9
Coffee pods	629	26.9

Other	150	6.4
Total Respondents	2,334	-

*N.B. Percentages do not total 100% as respondents could select more than one option*

If other, please specify:

Respondents who selected 'Other' had their comments grouped into themes. A full breakdown can be viewed below.

Item	No.	%
<b>Plastic food packaging</b> - Crisp packets / Cereal bags / plastic wrapping	17	12.1
Anything / Everything	16	11.4
Light Bulbs	10	7.1
Hard plastics	10	7.1
<b>Blister Packs</b> - Tablets / Contact lenses	9	6.4
Metal	8	5.7
Clothes / Shoes	7	5.0
<b>Bulky Items</b> - Fridge / Freezer / Washing Machine / Beds / Furniture	7	5.0
Polystyrene / Foams	6	4.3
Wood	6	4.3
Pet food pouches	6	4.3
<b>Kitchenware</b> - Saucepans / Kitchen Utensils / Cutlery	5	3.6
Paint pots	5	3.6
Aluminium / Tin foil	4	2.9
Plastic / Polythene bags	3	2.1
Books	3	2.1
Misc.	39	27.9
<b>Total Respondents</b>	<b>140</b>	<b>-</b>

*N.B. Percentages total more than 100% as respondents could select more than one option*

The ability to recycle '**Small electrical items**' was highest amongst respondents who identify as disabled and those aged 55+ (89.1% and 88.8% respectively); it was lowest amongst those with a child in the house and females (83.1% and 84.5% respectively).

The ability to recycle '**Household Batteries**' was more prevalent by males and those with a child in the household (87.6% and 86.7% respectively).

In line with what respondents said they'd like to see collected from the kerbside, those aged under 35 were almost twice as likely as those aged 55+ to want '**Coffee Pods**' recycled within the community (38.4% and 21.5% respectively).

Over four fifths of all deprivation groups analysed would like to see '**Small electrical items**' recycled within the community.

Are you aware of Terracycle initiatives, to recycle 'hard to recycle' items such as crisp packets, cleaning products, food pouches?

Less than two in five (37.8%) respondents are aware of Terracycle initiatives to recycle 'hard to recycle' items such as crisp packets, cleaning products and food pouches.

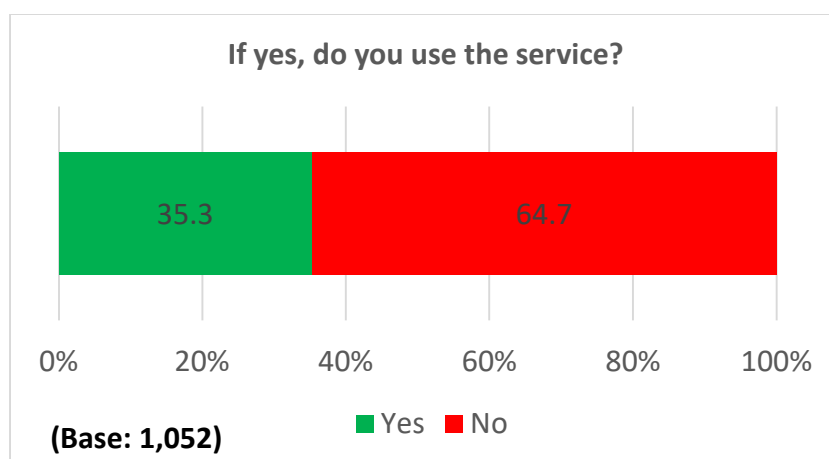
	No.	%
Yes	1,065	37.8
No	1,753	62.2
Total Respondents	2,818	100.0

Awareness was highest amongst respondents aged under 35 and those with a child in the household (43.1% and 42.2% respectively); it was lowest amongst males and those that reside in the southern arc of the city (30.6% and 32.9% respectively).

There was no correlation by deprivation.

If yes, do you use the service?

Respondents aware of the Terracycle initiative were asked if they used the service; just over a third (35.3%) indicated that they do.



Respondents aged 55+ and those with a child in the house were the two groups identified as most likely to use the service (39.2% and 38.1% respectively).

One in four (25.4%) respondents who reside in the most deprived areas of Cardiff stated that they use the service, this rises to around two in five (41.1%) when viewed by respondents from the least deprived areas.



## If no, why not?

Respondents who were aware of the initiative but didn't use it were presented with a list of pre-coded options so they could tell us why they don't use the service.

'**I don't know where the recycling points are**' (51.7%) was the most common reason why people don't use the service, this was followed by '**None local to me**' (36.5%).

	No.	%
I don't know where the recycling points are	351	51.7
None local to me	248	36.5
I don't have the types of item they recycle	65	9.6
Other	121	17.8
Total Respondents	679	-

*N.B. Percentages do not total 100% as respondents could select more than one option*

## If other, please specify:

Respondents who selected 'Other' had their comments grouped into themes. The top three themes, along with example comments can be viewed below and overleaf. A full breakdown can be viewed in Appendix Q.

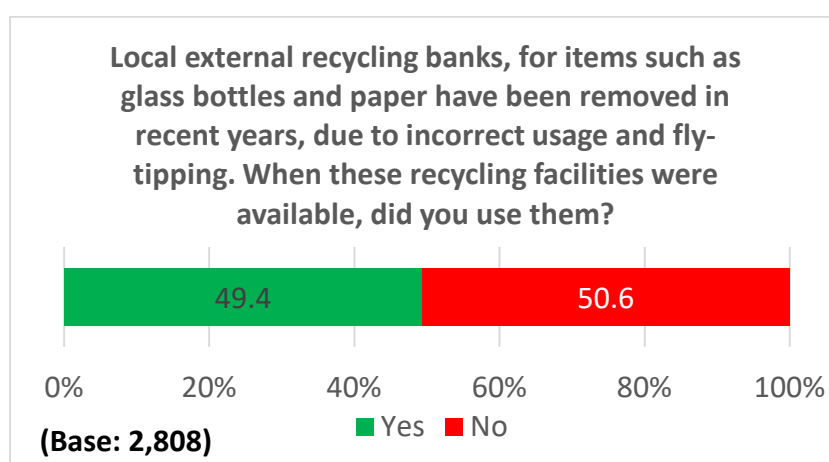
Theme	No.	%	Example Comments
Don't have the time / Insufficient Storage / Space to store and recycle numerous items	36	30.5	<ul style="list-style-type: none"> <li>I don't have time and not enough space to store items between drop-offs.</li> <li>It's too difficult to store and recycle different things.</li> <li>Too time consuming.</li> <li>Don't have room to store individual recycle waste. Not hygienic to store all the different containers etc.</li> <li>It's too much effort to store it all up to then take to the centre, we do not have the internal storage space.</li> </ul>
Location / Collection / Drop off point not convenient	18	15.3	<ul style="list-style-type: none"> <li>Difficult to drop off at times when open.</li> <li>I would have to drive (not very green) to access a collection point.</li> <li>Only once a week on a Saturday morning not at all convenient for me.</li> <li>Collection point keeps moving, timing is inconvenient.</li> </ul>
Accessibility Issues	14	11.9	<ul style="list-style-type: none"> <li>I'm disabled and can't drive so I can't go carry rubbish around with me.</li> </ul>

			<ul style="list-style-type: none"> <li>• Difficult to access.</li> <li>• I don't have a vehicle to get there.</li> </ul>
--	--	--	--

**'I don't know where the recycling points are'** was the most common reason for not using terecycle initiatives across each of the demographic, geographical and deprivation groups analysed.

Local external recycling banks, for items such as glass bottles and paper have been removed in recent years, due to incorrect usage and fly-tipping. When these recycling facilities were available, did you use them?

Half (49.4%) of respondents indicated that they used to make use of this facility when it was available.



Respondents aged 55+ and those that identify as disabled were the groups most likely to have used the local recycling banks (both 56.0%); least likely were those aged under 35 and respondents with a child in the household (35.7% and 43.1% respectively).

There was no correlation by deprivation.

When you no longer have a use for a large household item, for example a dining table/sofa, how do you remove it from your house?

Respondents were presented with a list of pre-coded options and asked to select any methods they used.

**'Try to donate it to charity shop'** (69.9%) was the most conventional way respondents would try to dispose of an unwanted item. This was followed by **'Book a Council bulky waste collection'** (55.7%) and **'Advertise for free on social media platforms'** (48.6%).

Although viewed as the least common way to dispose of an item, **'Arrange a collection from the company I'm buying a new item from'** was selected by over one in four (27.6%) respondents.

	No.	%
Try to donate it to a charity	1,914	67.9
Book a Council bulky waste collection	1,571	55.7

Advertise for free on social media platforms	1,371	48.6
Attempt to sell online, and on social media platforms	1,005	35.7
Take it to a Household Recycling Centre	881	31.3
Arrange a collection from the company I'm buying a new item from	777	27.6
Other	102	3.6
Total Respondents	2,819	-

*N.B. Percentages do not total 100% as respondents could select more than one option*

If other, please specify:

Respondents who selected 'Other' had their comments grouped into themes. The top three themes, along with example comments can be viewed below. A full breakdown can be viewed in Appendix R.

Theme	No.	%	Example Comments
Pay for a commercial registered company	21	25.0	<ul style="list-style-type: none"> <li>• Pay for removal by registered clearance company.</li> <li>• Book a commercial disposal as the lead times for Council collections mean I have to store the items for weeks/months before collection.</li> <li>• Use a private waste management company.</li> <li>• Employ a registered waste carrier.</li> <li>• Pay a private contractor.</li> </ul>
Offer to family / friends	14	16.7	<ul style="list-style-type: none"> <li>• Offer it to younger generation family members.</li> <li>• Always offer to family first.</li> <li>• Ask friends and family if they want the item.</li> </ul>
Leave outside for scrap metal dealers	9	10.7	<ul style="list-style-type: none"> <li>• If it is metal, I leave it in the forecourt and the Scrap Metal dealers often remove it.</li> <li>• Put it kerbside for ironmonger collection where possible.</li> <li>• Saw it up &amp; leave metal parts for scrap metal collectors.</li> </ul>

**'Try to donate it to charity shop'** was the most common way respondents would try to dispose of an unwanted item across each of the demographic and geographic groups analysed.

Three fifths of respondents aged 55+ and those that identify as disabled would **'Book a Council bulky waste collection'** (59.6% and 60.1% respectively); this falls to just over two fifths (43.9%) when viewed by respondents aged under 35.

Over three fifths (62.5%) of respondents aged under 35 would '**Advertise for free on social media platforms**'; this is 22 percentage points higher than their counterparts aged 55+ (40.5%).

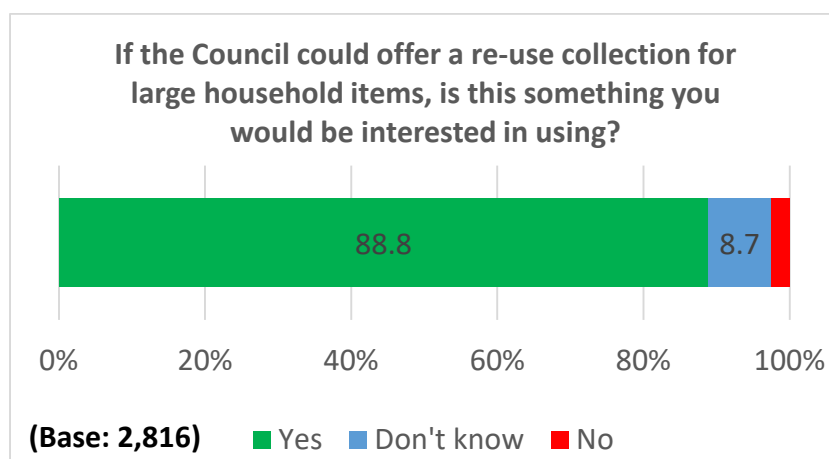
One in four (24.2%) respondents aged 55+ would '**Attempt to sell online, and on social media platforms**'; this more than doubles when viewed by respondents aged under 35 (61.2%).

Males were more likely than females to '**Take it to a Household Recycling Centre**' (37.7% and 28.0% respectively).

Over a half (55.0%) of respondents in the most deprived areas of Cardiff indicated that they would '**Try to donate it to charity shop**'; this rises to over seven in ten (72.3%) when viewed by respondents from the least deprived areas.

If the Council could offer a re-use collection for large household items, is this something you would be interested in using?

Just under nine in ten (88.8%) respondents would be interested in a re-use collection for large household items. Just 2.5% of respondents stated that this is a service they would not be interested in using.



All demographic and deprivation breakdowns were broadly consistent with the overall findings.

## Section 4 - Make use of all available data, to develop targeted actions

Through our Capital Ambition, Cardiff has identified its vision to be a Smart City. One of our missions is to be a 'data-driven city' using data to improve decision making, provide better services and promote innovation in the City. We will also work to identify sources of data, within the recycling services operation, that we can further publish in line with the open data strategy. (This would be in line with data protection guidelines and personal data would not be published).

This includes areas such as education and enforcement action statistics, as well as promoting the open data available in relation to recycling and material destinations including Stats Wales and information published from Waste Data Flow at [www.myrecyclingwales.org.uk](http://www.myrecyclingwales.org.uk)

Would you be interested in information on any of the following?

Respondents were presented with a list of pre-coded options and asked to select those in which they'd be interested in receiving information.

**'Where recycling materials are sent to be processed, and their end destination'** (57.1%) was seen as the most common topic. This was followed by **'Recycling performance'** (47.8%) and **'The breakdown of material collected e.g. what material is within green recycling bags, black bins etc.'** (44.8%).

Over a quarter (26.4%) stated **'No, I'm not interested'**.

	No.	%
Where recycling materials are sent to be processed, and their end destination	1,460	57.1
Recycling performance	1,223	47.8
The breakdown of material collected e.g. what material is within green recycling bags, black bins etc	1,146	44.8
Street cleansing statistics	986	38.6
Contamination levels	924	36.2
Education and enforcement activities	743	29.1
Number of household collections provided	571	22.3
No, I'm not interested	675	26.4
Other	68	2.7
Total Respondents	2,556	-

*N.B. Percentages total more than 100% as respondents could select more than one option*

If other, please specify:

Respondents who selected 'Other' had their comments grouped into themes. A full breakdown can be viewed below / overleaf:

Theme	No.	%
Participation Rates - Ward / House type	10	15.4
Fly-tipping / Littering	7	10.8
Failed / Missed collections	6	9.2
What happens after collected	6	9.2
Other orgs. / Community info	5	7.7
Sanctions imposed	4	6.2
Details on the process	3	4.6
Misc.	27	41.5
<b>Total Respondents</b>	<b>65</b>	<b>-</b>

*N.B. Percentages total more than 100% as respondents could select more than one option*

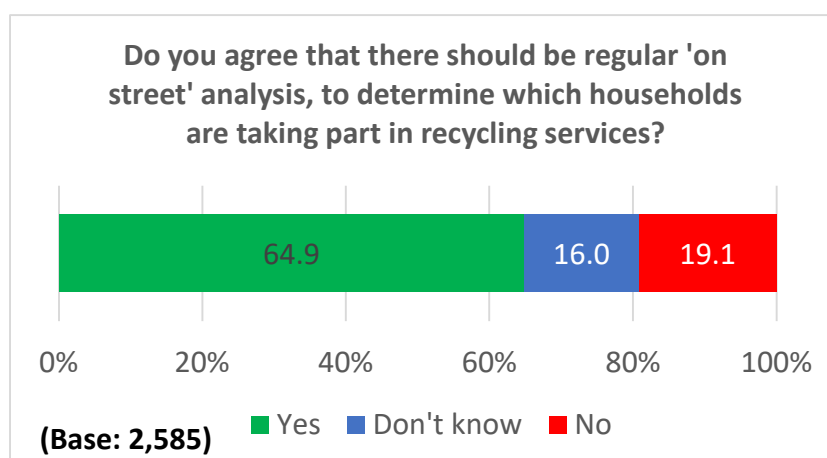
Males were more likely than females to be interested in '**Recycling performance**' (47.9% and 38.4% respectively). Similarly, those aged under 35 were seen to be more interested than those aged 55+ (50.0% and 40.6% respectively).

Males and those aged under 35 (44.6% and 43.8% respectively) also showed a far greater interest in '**The breakdown of material collected e.g. what material is within green recycling bags, black bins etc**' when compared to females and those aged 55+ (35.8% and 36.5% respectively).

Respondents with a child in the household and females were the two groups more inclined to cite '**No, I'm not interested**' (25.3% and 24.0% respectively).

Do you agree that there should be regular 'on street' analysis, to determine which households are taking part in recycling services?

Over three in five (64.9%) respondents agree there should be regular 'on street' analysis, to determine which households are taking part in recycling services.



At least three fifths of all the demographic and geographical groups analysed agreed that there should be regular 'on street' analysis.

Seven in ten (69.2%) respondents from the most deprived areas agreed. However, this drops to 63.1% when viewed by respondents from the least deprived areas.

Where it is identified a household is not taking part in a recycling collection service, do you agree that education and support should be provided to find out why?

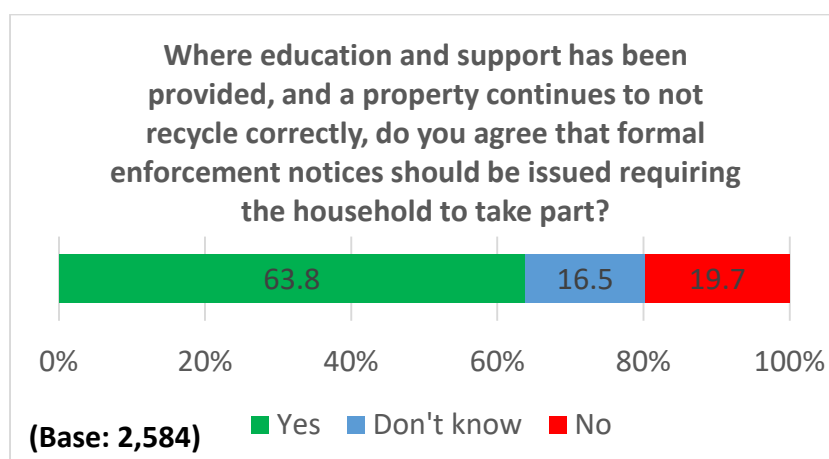
Nine in ten (90.3%) respondents agree that where it is identified a household is not taking part in a recycling collection service, that education and support should be provided to find out why.

	No.	%
Yes	2,333	90.3
No	252	9.7
Total Respondents	2,585	100.0

Results by demographic / deprivation breakdowns were broadly consistent with the overall findings.

Where education and support has been provided, and a property continues to not recycle correctly, do you agree that formal enforcement notices should be issued requiring the household to take part?

Over three fifths (63.8%) agree that where education and support has been provided, and a property continues to not recycle correctly, that formal enforcement notices should be issued requiring the household to take part. One in five (19.7%) disagree with this approach.



Agreement was highest amongst respondents who reside in the southern arc of the city and those from a minority ethnicity (68.9% and 68.6% respectively); it was lowest amongst those that identify as disabled and respondents with a child in the household (61.3% and 63.3% respectively).

Over two thirds (67.1%) of respondents from the most deprived areas agreed with formal enforcement notices; this is 4.1 percentage points higher than that of the findings from the least deprived areas (63.0%).

Do you agree that the Council should embrace new technologies, to improve our services? This could include technologies such as litter bin sensors, mobile working devices, on vehicle bin weighing equipment etc.

Almost half (48.7%) of respondents agree that the Council should embrace new technologies to improve services. However, this rises to almost two thirds (65.4%) when 'Don't know' responses are removed from the analysis.

	Including Don't know responses		Excluding Don't know responses	
	No.	%	No.	%
Yes	1,261	48.7	1,261	65.4
Don't know	659	25.5	-	-
No	667	25.8	667	34.6
Total Respondents	2,587	100.0	1,928	

Agreement was highest amongst respondents aged under 35 and males (63.2% and 54.5% respectively); it was lowest amongst respondents aged 55+ and females (44.1% and 46.5% respectively).

There was no correlation by deprivation.



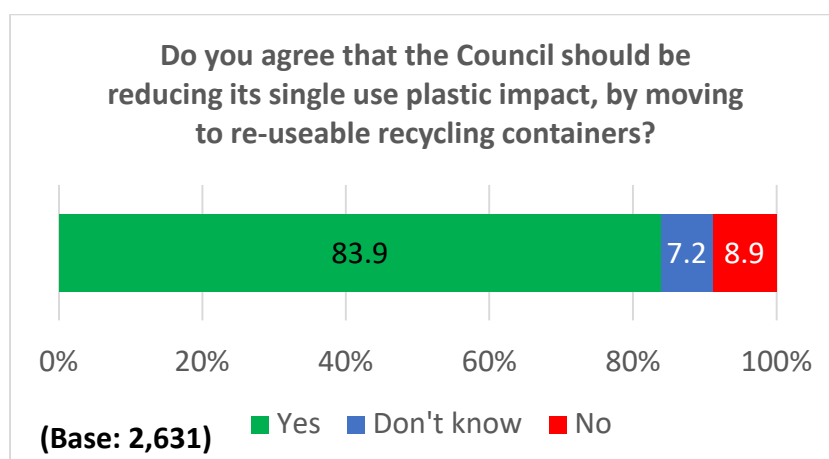
## Section 5 - Reduce single use plastics

Cardiff's One Planet Strategy proposes a wide range of ambitious actions that will begin to form the basis of a delivery plan to achieve Carbon Neutrality. Within this, there is a commitment to reduce the Council's use of single use plastics, and the recycling and waste service is integral in developing and implementing an action plan for single use plastics.

We currently issue 24 million single use green recycling bags across the City, for the kerbside collection of dry recyclables. We recognise the recycling collection service needs to be reviewed not only to improve material quality and increase recycling rates, but to also significantly reduce our carbon impact in terms of single use plastics.

Do you agree that the Council should be reducing its single use plastic impact, by moving to re-useable recycling containers?

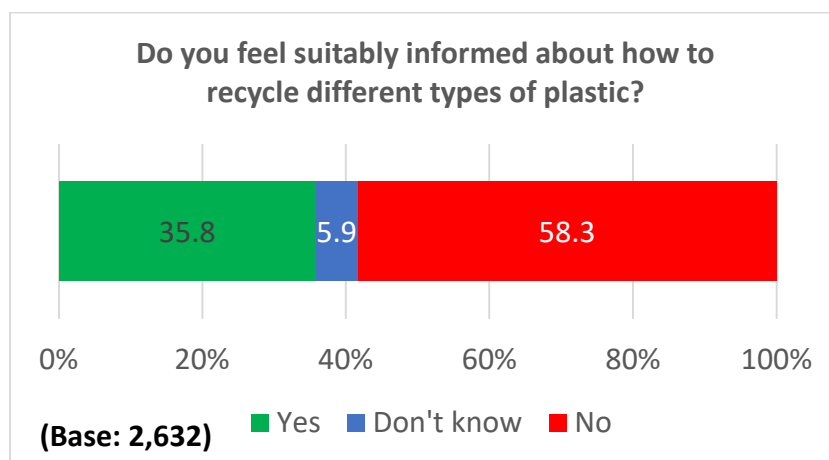
Over four fifths (83.9%) of respondents agree that the Council should be reducing its single use plastic impact, by moving to re-useable recycling containers.



Agreement was highest amongst respondents aged under 35 and females (86.7% and 85.6% respectively); it was lowest with minority ethnicity respondents and those that identify as disabled (76.7% and 77.0% respectively).

There was no correlation by deprivation.

Do you feel suitably informed about how to recycle different types of plastic?  
 Almost three in five (58.3%) respondents do not feel suitably informed about how to recycle different types of plastic.



Respondents aged under 35 (39.8%) and those with a child in the household or reside in the southern arc (both 38.7%) were the groups identified as feeling most informed; least likely were males and those aged 55+ (32.0% and 32.4% respectively).

There was no correlation by deprivation.

Are you aware of Re-fill Cymru, and its app / website identifying locations that provide re-fill across the city?

Around one in eight (12.7%) respondents are aware of Re-fill Cymru, and its app / website identifying locations that provide re-fill across the city.

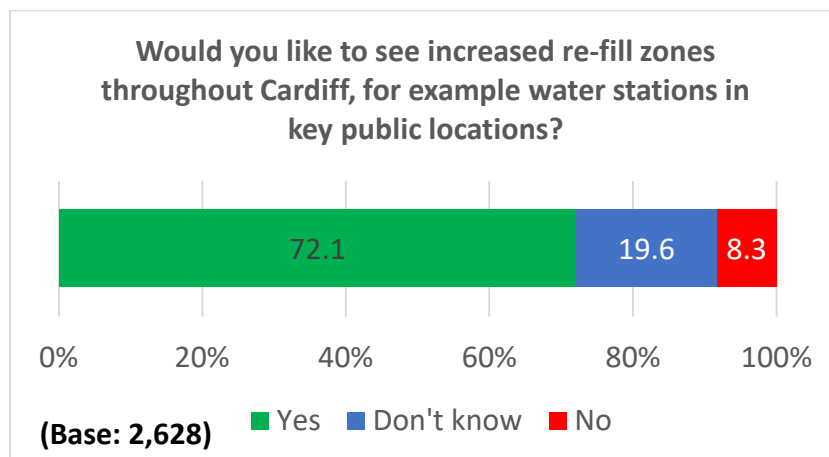
	No.	%
Yes	335	12.7
No	2,295	87.3
Total Respondents	2,630	100.0

Awareness was highest amongst respondents from a minority ethnicity and those aged under 35 (18.0% and 16.0% respectively); it was lowest by males and those aged 55+ (9.1% and 10.3% respectively).

There was no correlation by deprivation.

Would you like to see increased re-fill zones throughout Cardiff, for example water stations in key public locations?

Over seven in ten (72.1%) respondents would like to see increased re-fill zones throughout Cardiff.



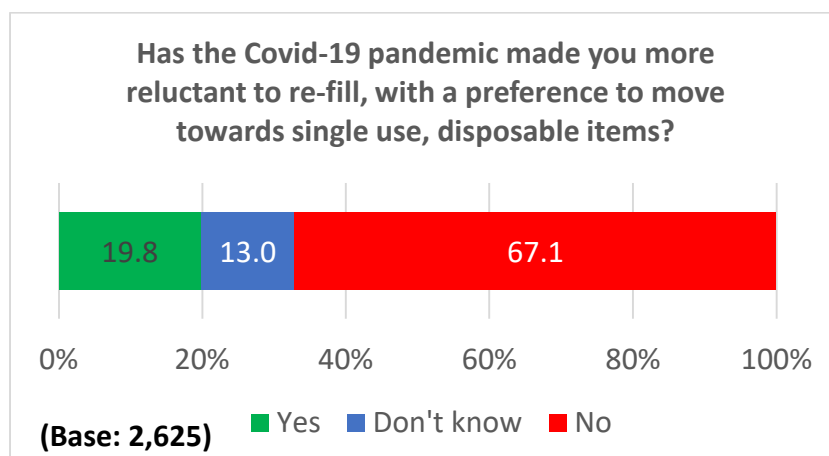
Respondents aged under 35 and those that reside in the southern arc were the groups identified as the most likely to want increased water zones throughout the city (85.7% and 77.8% respectively); least likely were those aged 55+ and males (67.4% and 67.7% respectively).

There was no correlation by deprivation.

Has the Covid-19 pandemic made you more reluctant to re-fill, with a preference to move towards single use, disposable items?

One in five (19.8%) respondents feel that the Covid-19 pandemic made them more reluctant to re-fill, with a preference to move towards single use, disposable items. However, over two thirds (67.1%) indicated that the pandemic has had no influence on them moving towards single use, disposable items.

Agreement with this rises to almost two in five (38.6%) when viewed by respondents who said they would not like to see increased water zones throughout the city



Respondents who identify as disabled and those aged under 35 were the groups most reluctant to refill due to the pandemic (24.6% and 23.8% respectively); least likely to be affected were males and those that reside in the southern arc of the city (17.8% and 17.9% respectively).

There was no correlation by deprivation.

How do you think the Council could reduce, or support initiatives that reduce single use plastic across the city?

Respondents who selected 'Other' had their comments grouped into themes. The top three themes, along with example comments can be viewed below. A full breakdown can be viewed in Appendix S.

Theme	No.	%	Example Comment
Tax on plastic / Ban sale/ restrict use of single plastic	218	22.9	<ul style="list-style-type: none"> <li>• Persuade businesses not to use single use plastic if at all possible.</li> <li>• Force companies to stop using so much single use plastic.</li> <li>• Ban the sale of items sold in single use plastic containers.</li> <li>• Plastic tax.</li> <li>• Enforce shops and manufacturing to use recyclable materials in the first place.</li> </ul>
<b>Support Initiatives</b> - Incentivise / Lower taxes for environmentally friendly businesses	205	21.6	<ul style="list-style-type: none"> <li>• By lowering business rates for appropriate businesses.</li> <li>• Assist independent zero waste shops.</li> <li>• Tax relief for businesses that take part.</li> <li>• Reduce business rates for retailers who provide re-fill in their shops.</li> <li>• Subsidies for shops that provide package free produce e.g. rice, shampoo etc to enable them to make their products cost effective in these difficult financial conditions.</li> </ul>
Greater Legislation / Fines / partnership with Businesses / Manufacturers	192	20.2	<ul style="list-style-type: none"> <li>• Put pressure on supermarkets who use unnecessary plastic packaging.</li> <li>• Pressure companies to stop producing them.</li> <li>• Pressure business to drive change.</li> <li>• Work with supermarkets and takeaway business to reduce single use plastics. Better support businesses that don't use or sell plastic items or packaging.</li> <li>• Legislate against the manufacturers!</li> </ul>

## Section 6 - Encourage and support the prevention, reuse and repair of materials

Welsh Government's Beyond Recycling strategy states 'In order to move to a circular, low carbon economy we will need to reduce the amount of waste produced by households, businesses and the public sector so that unnecessary waste is prevented, products are re-used, and repair and remanufacturing are a core part of our society'.

Our vision is that the actions from Cardiff Waste Strategy will not just be about achieving statutory recycling targets but also aims and objectives that support waste prevention, reuse and a circular economy.

Do you participate in any of the following, which aim to prevent waste?

Respondents were presented with a pre-coded list of ways to prevent waste, and asked to identify any they participate in.

Overwhelmingly, the main thing respondents do to prevent waste is to **'Take re-useable shopping bags and refuse single use bags'** (95.7%). This was followed by **'Love food, hate waste' initiatives such as only buying what you need, finding a use for leftovers, storing food correctly to enhance lifespan** (52.1%) and **'Choose 'preloved' for items such as clothes, furniture'** (39.2%).

	No.	%
Take re-useable shopping bags and refuse single use bags	2,340	95.7
'Love food, hate waste' initiatives such as only buying what you need, finding a use for leftovers, storing food correctly to enhance lifespan	1,274	52.1
Choose 'preloved' for items such as clothes, furniture	958	39.2
Take re-fill containers, for drinks, food supplies etc	904	37.0
Home compost	817	33.4
Shop in zero waste stores	499	20.4
Borrow rather than buy	433	17.7
Use real nappies	103	4.2
Other	136	5.6
Total Respondents	2,444	-

*N.B. Percentages total more than 100% as respondents could select more than one option*

If other, please specify:

Respondents who selected 'Other' had their comments grouped into themes. The top three themes, along with example comments can be viewed below. A full breakdown can be viewed in Appendix T.

Theme	No.	%	Example Comments
Repair / repurpose Items / upcycle	31	23.5	<ul style="list-style-type: none"> <li>• Repair and reuse where possible.</li> <li>• I repair small electrical items (I am qualified to do this) Encourage free repair locations say once a month at Hubs. I would volunteer.</li> <li>• Repair shoes, clothes etc.</li> <li>• Repair if possible all domestic items specifically mechanical &amp; electrical.</li> </ul>
<b>Use no packaging options</b> - Loose fruit & Veg / Soap / ethical wrapping / reusable shopping bags	26	19.7	<ul style="list-style-type: none"> <li>• Chose no-packaging options e.g. buy loose fruit &amp; veg at a market/greengrocer instead of plastic-wrapped/bagged supermarket option.</li> <li>• Only use soap instead of shower gel, bottle shampoo etc.</li> <li>• Take Tupperware to Morrisons for meat/fish etc. leave packaging at supermarket where no option.</li> <li>• Not buy pre-packaged food.</li> </ul>
Social media sites - Freecycle / give away unwanted items	19	14.4	<ul style="list-style-type: none"> <li>• Social media platforms for recycling within the community.</li> <li>• Use Too Good to Go app to help reduce food waste.</li> <li>• Giving away items I no longer need rather than sending to landfill.</li> </ul>

**'Take re-useable shopping bags and refuse single use bags'** was cited by at least nine tenths of respondents across each of the demographic, geographical and deprivation groups analysed.

**'Love food, hate waste' initiatives such as only buying what you need, finding a use for leftovers, storing food correctly to enhance lifespan'** were used far more by females than males (59.4% and 42.9% respectively).

Female respondents were twice as likely as their male counterparts to **Choose 'pre loved' for items such as clothes, furniture'** (49.2% and 24.7% respectively).

One in five (19.5%) respondents aged under 35 reported to **'Home compost'**; this doubles when viewed by those aged 55+ (40.3%).

Over a third (37.6%) of females **'Shop in zero waste stores'**; this is more than double that of males, respondents aged 55+ and those that identify as disabled (14.3%, 14.5% and 15.6% respectively).

One in four (25.8%) respondents from the most deprived areas reported that they **'Home compost'**; this rises to over two fifths (41.0%) when viewed by respondents from the least deprived areas.

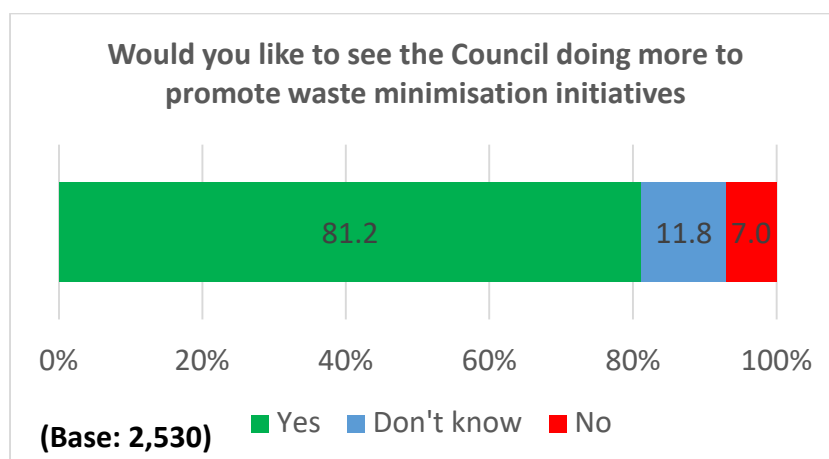
Respondents living in a Flat, Maisonette, Bedsit, Studio or Room only (54.2%) were twice as likely to **'Choose pre loved for items such as clothes, furniture'** than those that live in a detached property (27.3%).

Over one in five (21.2%) respondents living in a Flat, Maisonette, Bedsit, Studio or Room only **'Borrow rather than buy'**; this falls to around one in eight (12.7%) when viewed by those that live in a detached property.

Respondents living in a terraced property and those in a Flat, Maisonette, Bedsit, Studio or Room only were the groups most likely to **'Take re-fill containers, for drinks, food supplies etc'** (44.1% and 42.9% respectively).

Would you like to see the Council doing more to promote waste minimisation initiatives?

Around four fifths (81.2%) of respondents would like to see the Council doing more to promote waste minimisation initiatives.



Over three in four respondents from all demographic, geographic and deprivation groups analysed would like to see the Council doing more to promote waste minimisation initiatives.

If yes, what options do you think we should explore?

Respondents who said they'd like to the council doing more to promote waste minimisation initiatives were then presented with a list of pre-coded options and asked to identify which ones they think the council should explore.

**'Consider re-usable recycling containers, rather than single use plastics'** (77.8%) was the most common option that respondents would like to see explored. This was followed by **'Work with partners, to increase the number of re-fill locations in Cardiff'** (68.6%) and **'Increased promotion of waste minimisation initiatives'** (65.6%)

	No.	%
Consider re-usable recycling containers, rather than single use plastics	1,563	77.8
Work with partners, to increase the number of re-fill locations in Cardiff	1,378	68.6
Increased promotion of waste minimisation initiatives	1,319	65.6
Offering incentives to encourage home composting	1,054	52.4
Offering incentives to encourage use of real nappies	716	35.6
Other	136	6.8
<b>Total Respondents</b>	<b>2,010</b>	<b>-</b>

*N.B. Percentages total more than 100% as respondents could select more than one option*

If other, please specify:

Respondents who selected 'Other' had their comments grouped into themes. The top three themes, along with example comments can be viewed below and overleaf. A full breakdown can be viewed in Appendix U.

Theme	No.	%	Example Comments
Make more resources available - repair shops / libraries of items etc.	37	27.6	<ul style="list-style-type: none"> <li>• Help support repair cafes and help extend "libraries of things" ideally through the hubs.</li> <li>• Libraries of things (e.g. household tools, toy libraries, baking cake moulds/equipment, baby equipment (highchairs etc), instruments).</li> <li>• Expand the number of re-use centres / shops</li> <li>• Send out information on places to get small electricals repaired, e.g. mobile phones, printers, etc. Encourage a repair culture.</li> <li>• Consider working in partnership with the Repair Cafe network to increase usage.</li> </ul>



<p>Better partnership / enforcement -in particular big business / manufacturers</p>	<p>32</p>	<p>23.9</p>	<ul style="list-style-type: none"> <li>• Massive fines for businesses or manufacturers making the waste to begin with, why can't we just buy things with minimal packaging, the amount of cardboard I go through alone each week from food packing alone is beyond, just waste, the info could be digitally printed onto clear 100% recyclable sourced plastic/paper packing.</li> <li>• Legislate to force supermarkets to only supply recyclable packaging.</li> <li>• Work with businesses to support innovation to reduce single use containers for food delivery.</li> <li>• Get businesses to reduce their plastic waste and force them to take back the plastic waste they force their customers to take.</li> </ul>
<p>Foster a reuse culture</p>	<p>28</p>	<p>20.9</p>	<ul style="list-style-type: none"> <li>• Incentives provided to households for innovative reusing and repurposing ideas.</li> <li>• Washable incontinence products where feasible. Promote wool over nylon and other plastic fibres.</li> <li>• Reusable recycling containers must be washable.</li> <li>• Donate refill items.</li> </ul>

***'Consider re-usable recycling containers, rather than single use plastics'*** was the favoured option by each of the demographic, geographical and deprivation groups analysed.

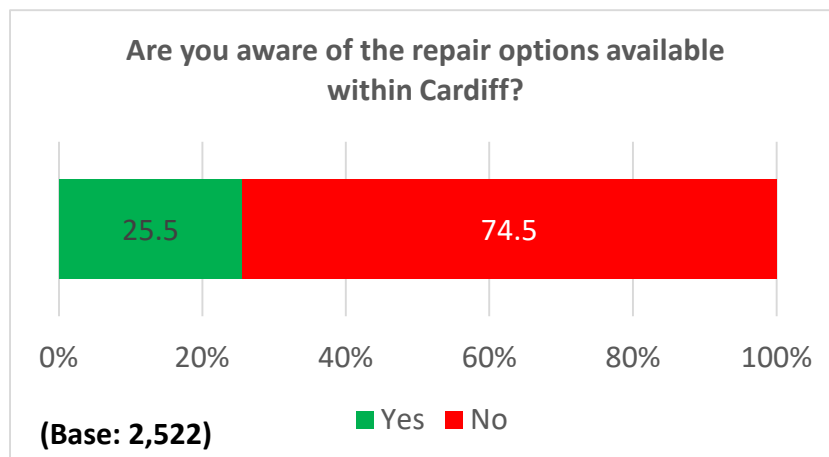
Over four fifths (81.9%) of respondents aged under 35 would like to see the council ***'Work with partners, to increase the number of re-fill locations in Cardiff'***; this drops to less than two thirds (63.1%) when viewed by respondents aged 55+.

Seven in ten (70.3%) respondents from the most deprived areas would like the council to ***'Work with partners, to increase the number of re-fill locations in Cardiff'***; this is 5.4 percentage points higher than that of the findings from respondents in the least deprived areas (64.9%).

Repair Cafes are available across the City, and there is a repair directory available at [www.repairefficiencywales.co.uk](http://www.repairefficiencywales.co.uk).

Are you aware of the repair options available within Cardiff?

One in four (25.5%) respondents are aware of the repair options available within Cardiff.

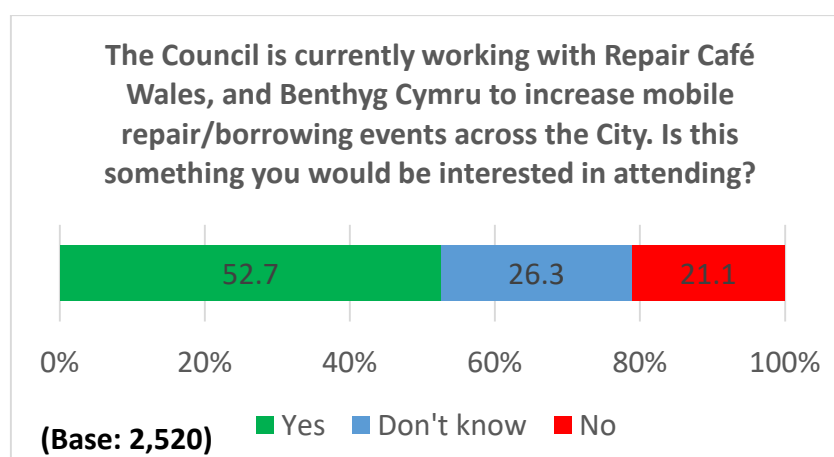


Awareness was highest amongst female respondents and those that reside in the southern arc of the city (30.7% and 30.0% respectively); it was lowest amongst males and those aged 55+ (17.9% and 23.5% respectively).

Almost three in ten (28.4%) respondents from the most deprived areas of Cardiff are aware of the repair options available in Cardiff; this drops to less than one in four (23.6%) when viewed by respondents from the least deprived areas.

The Council is currently working with Repair Café Wales, and Benthg Cymru to increase mobile repair/borrowing events across the city. Is this something you would be interested in attending?

Over half (52.7%) of respondents would be interested in attending the events across the City.

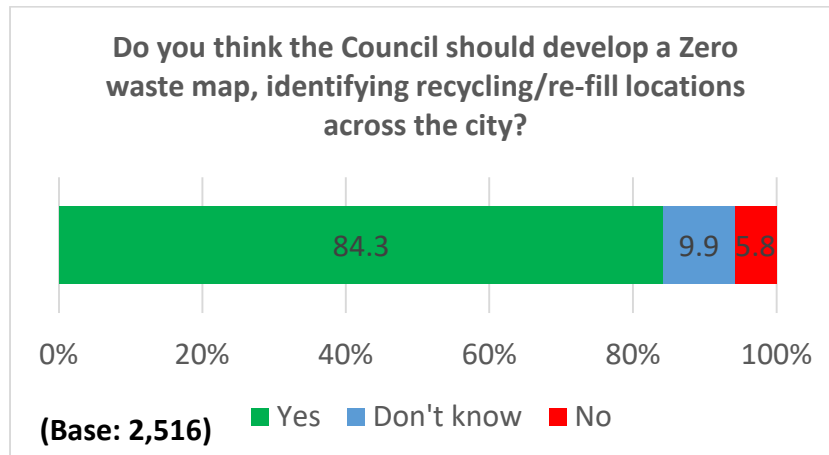


Respondents from a minority ethnicity and those aged under 35 were the groups that expressed the greatest interest (62.2% and 60.3% respectively); least interested were males and those aged 55+ (44.7% and 49.2% respectively).

There was no correlation by deprivation.

Do you think the Council should develop a Zero waste map, identifying recycling/re-fill locations across the city?

Over four fifths (84.3%) of respondents think the Council should develop a Zero waste map, identifying recycling/re-fill locations across the city.



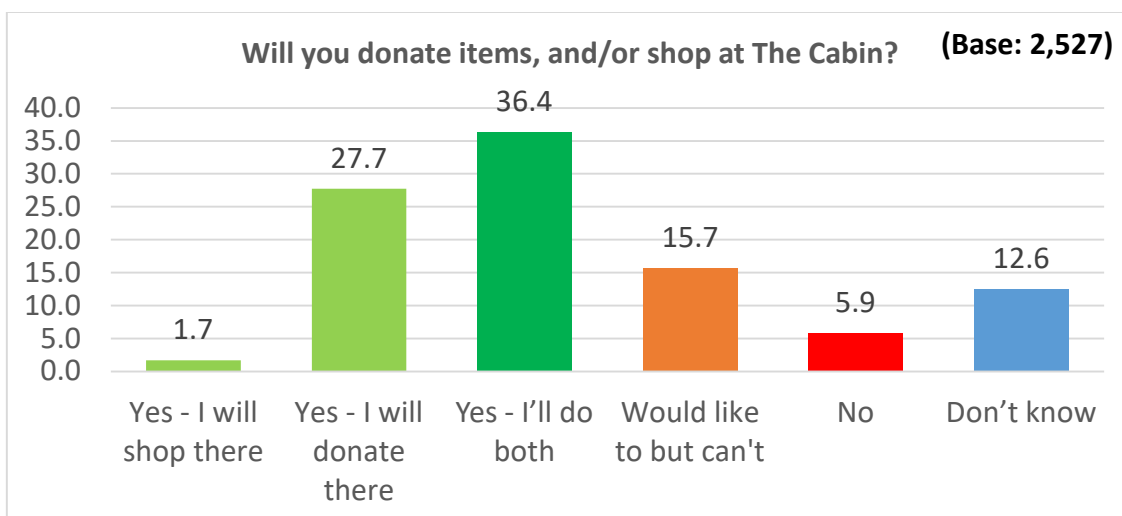
Those aged under 35 made up a significant proportion of respondents who agreed (93.4%); this compares with around four fifths (81.1%) of male respondents.

There was no correlation by deprivation.

In partnership with Wastesavers, the Council has launched a re-use shop 'The Cabin' at our Lamby Way Recycling Centre. You are able to donate items that are too good to waste, which will be sold back to communities at a small cost. As well as creating 30 jobs within the South East Wales region, the operation is also supported by 100 volunteers.

Will you donate items, and/or shop at The Cabin?

Almost two thirds (65.8%) of respondents stated that they shop / and (or) donate at The Cabin, this included 36.4% that will do both. Unfortunately, around one in six (15.7%) said they'd like to but can't.



Respondents aged under 35 and females were the groups identified as most likely to do both (46.7% and 41.3% respectively); least likely were males and those aged 55+ (31.3% and 32.2% respectively).

Three in ten (30.9%) of those who identify as disabled stated that they '**Would like to but can't**'; this is double that of the findings from the overall respondents (15.7%).

Less than one in five (18.7%) respondents from the most deprived areas of Cardiff said '**Yes – I will donate there**'; this almost doubles when viewed by respondents from the least deprived areas (34.5%).

One in five (20.5%) respondents from the most deprived areas '**Would like to but can't**'; this compares with around one in nine (11.5%) when viewed by those from the least deprived areas.

## Section 7 - Contribute towards developing a circular economy within Wales

As stated in Beyond Recycling 'The Government cannot bring about the transition to a circular economy alone.' We recognise the individual actions play a big part in this transition and will work with our residents and other stakeholders to recognise their contribution.

As a Council, we also have a clear responsibility to work towards this goal, with much of our corporate vision outlined within our One Planet Cardiff strategy.

One of the areas we are working on is reducing carbon emissions, by considering the use of electric vehicles within our vast collections and cleansing fleet. We currently have 17 electric vehicles across the service and are one of the first Welsh local authorities to have an electric Refuse Collection Vehicle (RCV).

Do you agree that the Council should look to move to the electrical vehicles, where the relevant infrastructure is available?

Over four fifths (85.0%) of respondents agree that the Council should look to move to the electrical vehicles, where the relevant infrastructure is available. However, this figure rises to over nine tenths (92.4%) if 'Don't know' responses are excluded from the analysis.

	Including Don't know responses		Excluding Don't know responses	
	No.	%	No.	%
Yes	2,039	85.0	2,039	92.3
Don't know	191	8.0	-	-
No	170	7.1	170	7.7
Total Respondents	2,400	100.0	2,209	100.0

Agreement was highest amongst those aged under 35 (91.0%); it was lowest amongst those who identify as disabled (80.2%).

There was no correlation by deprivation.

Cardiff is committed to being a Child Friendly City, and we are working with our child friendly city teams, in making young person's ideas a reality. We are doing this by, for example, expanding Terracycle points throughout the City and painting a community mural at the Recycling Centre designed by children.

Do you agree that it's important to tap into the enthusiasm of young people, to make long term changes? For example, through offering recycling and waste minimisation talks to schools.

The majority (91.9%) of respondents agree that it's important to tap into the enthusiasm of young people, to make long term changes.

	No.	%
Yes	2,210	91.9
Don't know	91	3.8
No	103	4.3
Total Respondents	2,404	100.0

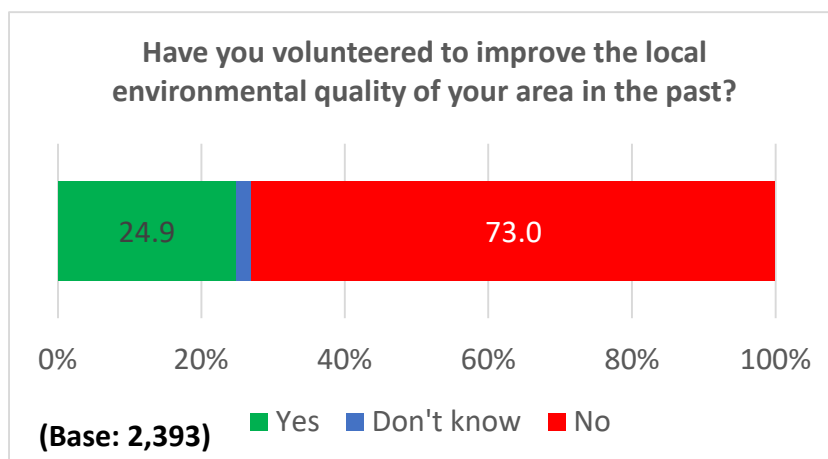
At least nine tenths of all demographic, geographical and deprivation groups analysed agreed that it's important to tap into the enthusiasm of young people, to make long term changes.

Cardiff Council is a partner of Caru Cymru, a Keep Wales Tidy initiative which aims to inspire everyone to take action and take care of the environment. The vision is for Caru Cymru to be interwoven into life in Wales, so it becomes second nature to 'do the right thing'. This could mean taking litter home, recycling 'on the go', cleaning up after your dog.

We are so lucky in Cardiff to have a comprehensive network of passionate volunteers through the Love Where You Live campaign.

Have you volunteered to improve the local environmental quality of your area in the past?

One in four (24.9%) respondents have volunteered to improve the local environmental quality of their area in the past.



These findings were consistent across the demographic groups analysed.

There was no correlation by deprivation.

If yes, how did you take part in the volunteering?

Respondents who stated that they'd previously volunteered to improve local environmental quality in their area were then presented with a list of pre-coded options and asked to indicate how they'd got involved.

**'I just saw the opportunity and got involved'** (43.5%) was viewed as the most common way in which respondents took part in volunteering. This was followed by **'I'm part of a community group e.g. Keep Grangetown Tidy'** (27.0%) and **'I'm a Love Where You Live Litter champion'** (12.6%).

	No.	%
I just saw the opportunity and got involved	253	43.5
I'm part of a community group e.g. Keep Grangetown Tidy	157	27.0
I'm a Love Where You Live Litter champion	73	12.6
I'm a Keep Cardiff Tidy Litter champion	58	10.0
Other	141	24.3
<b>Total Respondents</b>	<b>581</b>	<b>-</b>

*N.B. Percentages total more than 100% as respondents could select more than one option*

If other, please specify:

Respondents who selected 'Other' had their comments grouped into themes. A full breakdown can be viewed below / overleaf:

Theme	No.	%
Litter Picks	80	61.1
River Groups	15	11.5
Garden / Tree related	14	10.7
Not specified	12	9.2
Conservation group	4	3.1
Misc.	18	13.7
<b>Total Respondents</b>	<b>131</b>	<b>-</b>

*N.B. Percentages total more than 100% as respondents could select more than one option*

**'I just saw the opportunity and got involved'** was the most common way of getting involved across all demographic and geographical groups analysed. This was most notable by minority ethnic respondents and those that have a child in the house (51.0% and 49.7% respectively).

Respondents who identify as disabled (37.3%) were the group most likely to be **'Part of a community group'**, this is more than double that of respondents aged under 35 (17.2%).

Only 1 (2.0%) minority ethnic respondent was *'I'm a Love Where You Live Litter champion'*, this compares to over one in six when viewed by those aged under 35 and females (15.5% and 15.1% respectively).

Respondents in the most deprived areas were more likely to be *'Part of a community group'* than those that reside in the least deprived areas (40.4% and 31.2% respectively).

Would you like to learn more about volunteering in Cardiff?

355 (14.9%) respondents stated that they'd like to learn more about volunteering in Cardiff. Respondents who left their contact details have had their information passed onto the project team.

	No.	%
Yes	355	14.9
Don't know	462	19.4
No	1,564	65.7
Total Respondents	2,381	100.0

Minority ethnic respondents and those aged under 35 were the groups most likely to want to learn more about volunteering in Cardiff (23.1% and 20.2% respectively).

Less than one in ten (8.8%) of those who identify as disabled would be interested in learning more.

There was no correlation by deprivation.

Do you agree that a deposit return scheme should be launched in Wales, to reduce the impact of litter on the local environment? As part of this scheme, you would receive money back if disposable bottles were returned to a deposit return point. *Please remember, this is a scheme that would need to be introduced by the Government in Westminster, and not Cardiff Council.*

Four in five (79.2%) respondents agree that a deposit return scheme should be launched in Wales, to reduce the impact of litter on the local environment.

	No.	%
Yes	1,896	79.2
Don't know	278	11.6
No	221	9.2
Total Respondents	2,395	100.0

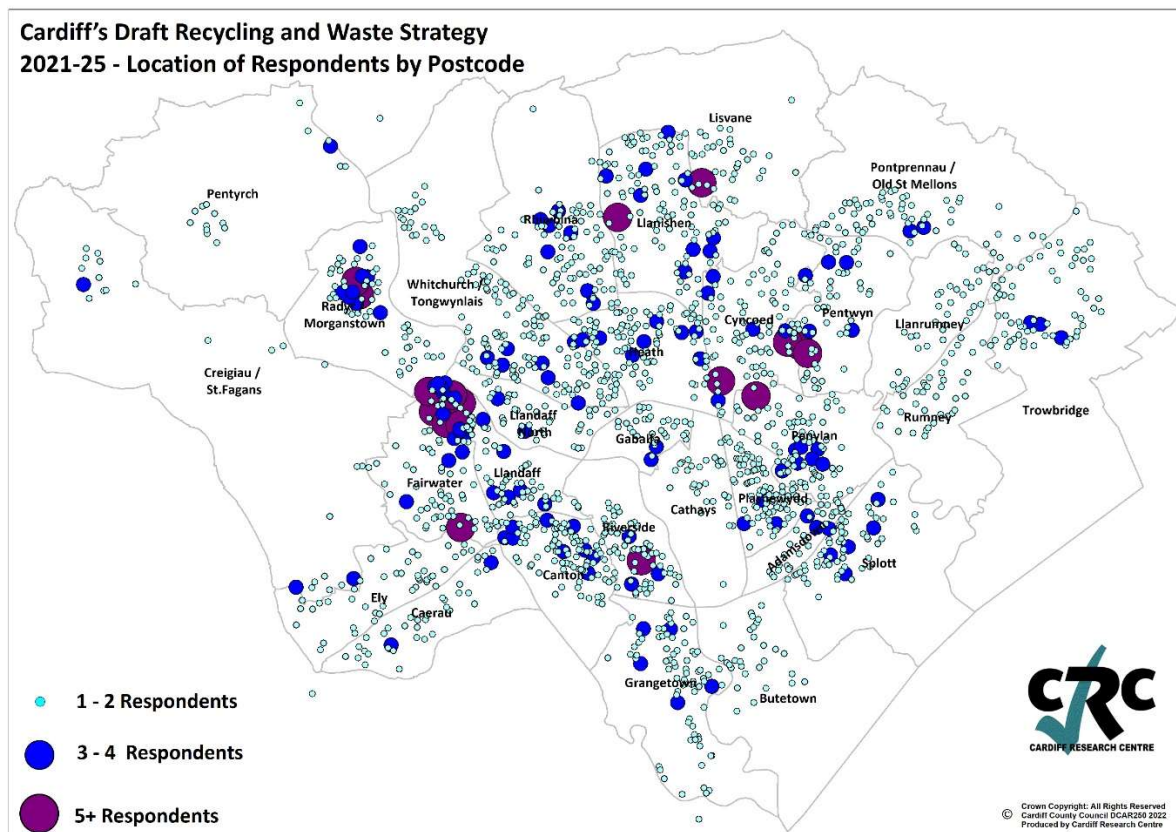
Agreement was highest amongst respondents aged under 35 and those who reside in the southern arc of the city (86.2% and 83.8% respectively); it was lowest with those who have a child in household and males (76.9% and 78.8% respectively).

Over four fifths (84.3%) of respondents in the most deprived areas agreed; this drops to 77.6% in the least deprived areas.



## About You

Please provide your postcode below to allow us to more accurately pinpoint respondents' views and needs by area: -



What was your age on your last birthday?

	No.	%
16-24	27	0.9
25-34	313	10.9
35-44	563	19.6
45-54	517	18.0
55-64	696	24.3
65-74	500	17.4
75+	166	5.8
Prefer not to say	87	3.0
<b>Total Respondents</b>	<b>2,869</b>	<b>100.0</b>

Are you...?

	No.	%
Female	1,655	57.7
Male	1,079	37.6
Prefer not to say	124	4.3
Other	12	0.4
<b>Total Respondents</b>	<b>2,870</b>	<b>100.0</b>

Do you identify as Trans?

	No.	%
Yes	8	0.3
No	2,621	93.6
Prefer to self-describe	19	0.7
Prefer not to say	153	5.5
<b>Total Respondents</b>	<b>2,801</b>	<b>100.0</b>

Do any children live in your household?

	No.	%
No children	2,037	72.5
Yes, under 5 years old (pre-school)	232	8.3
Yes, aged 5 - 11 (primary school)	339	12.1
Yes, aged 11 - 16 (secondary school)	283	10.1
Yes, aged 16 - 18 in full-time education, or working	140	5.0
Yes, aged 16 - 18 but not in full time education or working	19	0.7
<b>Total Respondents</b>	<b>2,808</b>	<b>-</b>

*N.B. Percentages do not total 100% as respondents could select more than one option*

Which of the following best describes what you are doing at present?

	No.	%
Working full time (30+ hours per week)	1,357	47.8
Wholly retired from work	754	26.6
Working part time (less than 30 hours per week)	369	13.0
Permanently sick or disabled person	85	3.0
Caring for a child or adult	57	2.0
Looking after home	52	1.8
In full time education	28	1.0
Unemployed - Unregistered but seeking work	23	0.8
On a zero hour contract	17	0.6
Unemployed - Registered Job Seeker	14	0.5
On a government training scheme	1	0.0
Other	81	2.9
<b>Total Respondents</b>	<b>2,838</b>	<b>100.0</b>

What type of property is your home?

	No.	%
Semi-detached house	1,057	37.3
Terraced house	807	28.5
Detached house	611	21.6
Flat, Maisonette	241	8.5
Detached bungalow	62	2.2
Semi-detached bungalow	25	0.9
Bedsit, Studio or Room only	5	0.2
Terraced bungalow	3	0.1
Caravan / Mobile home / houseboat	1	0.0
Other	23	0.8
<b>Total Respondents</b>	<b>2,835</b>	<b>100.0</b>

Do you identify as a disabled person?

	No.	%
Yes	322	11.5
No	2,342	83.5
Prefer not to say	141	5.0
<b>Total Respondents</b>	<b>2,805</b>	<b>100.0</b>

Please tick any of the following that apply to you:

	No.	%
Long-standing illness or health condition (e.g. cancer, diabetes, or asthma)	425	42.9
Mobility impairment	241	24.3
Mental health difficulties	191	19.3
Deaf/ Deafened/ Hard of hearing	165	16.7
Visual impairment	58	5.9
Learning impairment/ difficulties	35	3.5
Wheelchair user	26	2.6
Prefer not to say	198	20.0
Other	38	3.8
<b>Total Respondents</b>	<b>990</b>	<b>-</b>

*N.B. Percentages do not total 100% as respondents could select more than one option*

Do you consider yourself to be Welsh?

	No.	%
Yes	1,868	66.9
No	926	33.1
<b>Total Respondents</b>	<b>2,794</b>	<b>100.0</b>

What is your ethnic group?

*(Where the term 'British' is used, this refers to any of the four home nations of Wales, England, Northern Ireland and Scotland, or any combination of these).*

	No.	%
White - Welsh/English/Scottish/Northern Irish/British	2,471	87.7
White - Any other white background	99	3.5
White - Irish	31	1.1
Mixed/Multiple Ethnic Groups - White & Asian	18	0.6
Asian/Asian Welsh/British - Chinese	15	0.5
Mixed/Multiple Ethnic Groups - White and Black Caribbean	9	0.3
Mixed/Multiple Ethnic Groups - Any other	8	0.3
Asian/Asian Welsh/British - Indian	7	0.2
Black/African/Caribbean/Black Welsh/British – Caribbean	7	0.2

Asian/Asian Welsh/British - Any other	5	0.2
Mixed/Multiple Ethnic Groups - White and Black African	4	0.1
Arab	3	0.1
Black/African/Caribbean/Black Welsh/British - African	2	0.1
Asian/Asian Welsh/British – Pakistani	1	0.0
Black/African/Caribbean/Black Welsh/British - Any other	1	0.0
White - Gypsy or Irish Traveller	1	0.0
Prefer not to say	124	4.4
Any other ethnic group (please specify)	12	0.4
<b>Total Respondents</b>	<b>2,818</b>	<b>100.0</b>

Appendix A - Do you agree that this is the most suitable option for Cardiff? No, a full kerbside sort collection should be considered

Theme	No	%	Example Comment
Reusable sacks being blown away / not fit for purpose	149	33.2	<ul style="list-style-type: none"> <li>I feel that reusable sacks will get blown away/lost easily and have the potential for rubbish to be blown around the streets. Will they be waterproof enough to protect the paper recycling? HMOs already have a lot of bins outside</li> <li>These sacks empty their contents in the slightest breeze</li> <li>The current containers are totally unsuitable and are already leading to messy streets especially and the carts no longer come around. The contents get wet dirty and already the containers are becoming unpleasant</li> <li>There will be a risk to traffic on windy days when empty bags blow around</li> <li>Bags get wet, difficult to dry wet bags and store in house, bags blow away</li> </ul>
Storage concerns	129	28.7	<ul style="list-style-type: none"> <li>Some people do not have the space in their homes for 3 separate refuse bins, example, people in 1 bedroom flats, the kitchens are tiny &amp; have no room for 3 separate bins</li> <li>Nowhere to store the bags and rubbish live on busy street where bags will disappear and become lost</li> <li>Terraced houses with no rear access have no room for all the different sacks</li> <li>There isn't enough space in most properties for all these sorting containers, and people would not bring wet soggy dirty bags into their house.</li> <li>Too many containers involved. They will become dirty very quickly and nowhere to store them.</li> </ul>
Sorting concerns	63	14.0	<ul style="list-style-type: none"> <li>People will still not learn and still mix waste it is up to the council to improve their internal processes</li> <li>Having to sort at home will discourage people from recycling.</li> <li>The Council should sort after collection not before</li> </ul>

			<ul style="list-style-type: none"> <li>• It's a lot of work and still doesn't guarantee the right product for recycling being placed in the correct bin</li> <li>• people will be less inclined to sort properly leading to less recycling, I've lived in Swansea and people there can't be bothered to use all the different bags</li> </ul>
Keep process simple / may end up in general waste	58	12.9	<ul style="list-style-type: none"> <li>• Too complicated, recycled material will just go into black bin as it's less fuss</li> <li>• Asking people to jump through hoops to recycle will only lead to further use of general waste instead of recycling.</li> <li>• Most people won't have the space to store all these different 'containers' and may just give up and put more in general waste.</li> <li>• It will discourage people from recycling as having to store different options</li> </ul>
Need better containers	45	10.0	<ul style="list-style-type: none"> <li>• The sacks are not suitable. Small plastic bins for each waste is better and would last longer than bags which will get lost and damaged easier.</li> <li>• Containers last longer and prevent rats and seagulls attacking the rubbish.</li> <li>• The sacks are not very good. Bins should be used. If you want to separate sure but each type of rubbish should be a bin not a sack</li> <li>• All recyclables should be put in wheelie bins to avoid animals (cats, seagulls), smelling the food and destroying the bags, resulting in lost garbage in our streets. Why not dedicate green wheelie bins to recyclables and have bags for garden waste instead? (Just swap)</li> </ul>
Increase litter/Vermin on streets	38	8.5	<ul style="list-style-type: none"> <li>• The bags are a terrible idea they don't hold enough and the rubbish comes out and goes everywhere</li> <li>• I'm on this trial. It's a nightmare. There's a clean up to be done after every collection, too many bins to store, the sacks are awful and need to be changed to plastic bins</li> <li>• Reusable bags are likely to be blown around in gusty weather, leading to more litter in bushes, hedges etc..</li> <li>• As part of the trial the sacks are completely unsuitable. They do not stay closed and are</li> </ul>

			prone to sea gulls and fox's removing rubbish from the sacks which creates litter.
Accessibility concerns/health and safety	31	6.9	<ul style="list-style-type: none"> <li>• Not everyone (such as disabled) can do this fully</li> <li>• all the different boxes are dangerous left out for blind and disabled people.</li> <li>• Sacks are a risk to wildlife and road users. Wheelchair users have enough problems with litter and cats on pavements</li> <li>• The sacks will be heavy to carry once full.</li> </ul>
Agree with trial	27	6.0	<ul style="list-style-type: none"> <li>• Depending on the cost of suitable vehicles, one collection seems more environmentally friendly</li> <li>• The more we can recycle the better</li> <li>• Easy to do at home and allows money to be spent on other things, rather than sorting waste</li> </ul>
Prefer current system	26	5.8	<ul style="list-style-type: none"> <li>• If you make it hard for people to recycle they won't - keep it as it is I don't want a million bags to put stuff in - collect it and sort it</li> <li>• The current way is fine in our area.</li> <li>• The current system should be kept</li> </ul>
Concerns over Bin collection/Recycling Centres	24	5.3	<ul style="list-style-type: none"> <li>• Thousands of bags blowing all over the streets as your bin men are too idle to even put one food caddy back on the pavement and have been observed throwing them in a manner of a Welsh rugby line out</li> <li>• a glass caddy for glass bottles sounds a terrible idea - the bin men throw things around as it is - how long before it broke?</li> <li>• My sister-in-law who lives in Radyr watched your people tip everything into the same vehicle- so what is the point!</li> </ul>
Negative comments	20	4.5	<ul style="list-style-type: none"> <li>• You're asking us to sort more and yet charging more taxes</li> <li>• I pay my council tax for you to sort my rubbish I'm not doing your jobs for you</li> <li>• Every house will 3 bags, a food bin, a black bin and many houses will have green garden waste bin. The city will look an absolute shambles with all these bags and bins lying around. How many trips from the top of block of flats have to be made, how will old people in small houses manage. The council is paid to do a job, will council</li> </ul>



			tax be reduced if the public have to do the council's job?
Need more information/education	18	4.0	<ul style="list-style-type: none"> <li>• you need to educate the great unwashed. perhaps fine those who put the wrong refuse into the green bags</li> <li>• It is not clear what types of plastic is recyclable</li> <li>• I am assuming that fully sorting means easier to recycle and better for the environment - but this info was not given above? This explanation above when surveying would make it easier to make an informed decision.</li> </ul>
Benefits of full kerbside collection	17	3.8	<ul style="list-style-type: none"> <li>• From what I read a full kerbside collection would use one vehicle thereby reducing cost and pollution</li> <li>• Depending on the cost of suitable vehicles, one collection seems more environmentally friendly</li> <li>• It seems this will minimise the chances of getting the wrong materials in the wrong containers</li> </ul>
More Cost to replace bags	7	1.6	<ul style="list-style-type: none"> <li>• Would there be a charge for missing sacks? Boxes would be better but not ideal.</li> <li>• Once emptied re-usable bags are easily blown away. Residents would then have to pay for replacements.</li> </ul>
Other	41	9.1	<ul style="list-style-type: none"> <li>• We should be recycling at the micro level</li> <li>• Trial different methods</li> <li>• The problem is not that the materials you collect are "wrong" it's that you and the waste industry do not know how to deal with it. How can there be in your words "the wrong type of plastic!". Citizens don't make the plastic - manufacturers do so legislate against that. Citizens don't control waste management in the city- you do that what we pay you for. You have to figure out what to do with the waste. not the citizen</li> <li>• If you choose this '3' option, it will not be long before you need to go for the bigger option.</li> </ul>
<b>Total Responses</b>	<b>449</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*

Appendix B - Do you agree that this is the most suitable option for Cardiff? No, there should be different options for different areas of the city

Theme	No.	%	Example Comment
Storage concerns	418	46.5	<ul style="list-style-type: none"> <li>• where do you intend, I keep your extra sacks or boxes? My house isn't any bigger than it was before.</li> <li>• I live in a small flat and have no room. For 3 recycling bins, food waste bin and general waste bin.</li> <li>• Unfortunately, we do not have space in our house for additional bins. We already have five when considering recycling, landfill, food, supermarket bags &amp; teracycle.</li> <li>• Our homes aren't designed for so many storage options</li> <li>• Too many bags in my flat, how can I fit 5 bins in a small kitchen?</li> </ul>
Vary approach by accommodation type/ area	342	38.0	<ul style="list-style-type: none"> <li>• Different types of property may require different options due to storage space available</li> <li>• Not everywhere has storage, houses aren't the same as flats etc</li> <li>• Different issues / risks in more rural locations</li> <li>• Take Grangetown - HMOs, houses with gardens for bins, blocks of flats with shared bins, houses that open onto the street. One size cannot fit all</li> <li>• It cannot be a one size fits all for such different housing stock - consider the differences between properties in Cyncoed (plenty of room) with terraced housing - limited indoor space</li> </ul>
Bags not fit for purpose / unsecure/ blow away /porous / unhygienic	172	19.1	<ul style="list-style-type: none"> <li>• Reusable sacks are going to blow away once empty.</li> <li>• I live on Newport Road, sacks will get taken, blown away across traffic this will cause accidents</li> <li>• Sacks blow away and tear too easily (know from previous experience)</li> <li>• Bags will break, they will smell some built up areas waste will be spilt onto roads</li> <li>• Sacks blow away and we have to pay to replace them, they're also nasty to move through the house if wet, glass bins need</li> </ul>

			to be larger than those trialled previously and have better closure, so they don't fill with water
Concerns over access to pavements/litter/mess /vermin	82	9.1	<ul style="list-style-type: none"> <li>• Living in a part of the city with narrow pavements and houses that open directly onto the pavement, bin day is already a nightmare on the school run, with food bins and green bags blocking pavements. Navigating these with a wheelchair or buggy is very difficult. Having more containers on the street will make the footways impassable</li> <li>• Birds. Seagulls cause a great deal of havoc within the Butetown community</li> <li>• How do disabled people navigate a sea of bags, boxes and bins on the pavement?</li> <li>• Sacks are light when empty and not secure. Open boxes cause rubbish to be blown and are prone to wildlife interference.</li> <li>• I'm not keen on sacks/bags - living on the edge of the city the current bags get blown away if put out in stormy weather and spread litter all over the place.</li> </ul>
People won't participate / Will end up in general waste / fly tipping	80	8.9	<ul style="list-style-type: none"> <li>• I live in a small property and I haven't got room for various containers - I will be putting whatever I can in the black bin, so will be recycling less.</li> <li>• I would support this if you had an alternate option for glass. I've seen the caddies and they are far too small. This will lead to people not recycling.</li> <li>• I don't think this is realistic - you're making it more effort for people to recycle. The harder it is, the more people won't bother.</li> <li>• People in Cardiff won't bother with more bins to separate waste it will lead to less being recycled and more fly tipping than there already is.</li> <li>• Less likely to recycle if have multiple bins. One bag is easiest and encourages recycling</li> </ul>
Keep current system	67	7.5	<ul style="list-style-type: none"> <li>• Should maintain the current system which is easy to use and understand and creates fewer storage difficulties</li> </ul>

			<ul style="list-style-type: none"> <li>• I sort my recycling well, fine those who don't rather than change.</li> <li>• The green bags worked well, the reason that other items go in is that the black bins are too small</li> <li>• The most suitable option would be for things to stay the same.</li> <li>• The current routine should be optimised across the city increase where it is ineffective before rolling out more complex systems.</li> </ul>
Improve education and/enforcement	46	5.1	<ul style="list-style-type: none"> <li>• Further education on recycling well should be the primary method of fixing the contamination issue</li> <li>• Space is an issue. 5 containers is excessive. How hard have you tried enforcement?</li> <li>• Educate or fine people who do not Recycle food waste or dry recyclables</li> <li>• Not everyone is capable of understanding what you expect from them</li> </ul>
Sorting concerns	43	4.8	<ul style="list-style-type: none"> <li>• Not enough information up to the collection person to sort</li> <li>• The streets are not the place for sorting rubbish. The state of our streets leaves no room for hundreds of different sacks which will be blown away in winds. Take all rubbish and sort it in a sorting centre.</li> <li>• If residents aren't sorting items properly now that are likely to ignore extra sorting</li> <li>• People are incapable of correctly sorting, this should be done at the depot</li> </ul>
Need alternative storage/wheelie bins/stackable boxes	44	4.9	<ul style="list-style-type: none"> <li>• Some areas should have sealable containers like bin bags and caddies only</li> <li>• The sacks provided are not suitable for the proposal. Different material or different type needs to be provided ie on wheels so people can wheel it instead of carry it</li> <li>• I was in North Wales last September, &amp; their method of Collecting at the cottage we stayed in was Stackable Boxes, fitted on a Dolly trolley. The Bin men hosed them out after use. Bottles in the bottom one Cardboard &amp; paper in next one cans &amp; foil in next. A separate</li> </ul>

			<p>caddy for food, &amp; a bin for general rubbish. I thought it was a very good system, that Llandudno had.!</p> <ul style="list-style-type: none"> <li>• Wheelie bins are already in many households, why not use them in conjunction with this new system.?</li> </ul>
Accessibility concerns/health and safety	37	4.1	<ul style="list-style-type: none"> <li>• Difficult for elderly people to understand and sort. - what about disabled?</li> <li>• I think its ableist. Life is hard enough for many disabled people. I'm struggling hugely to cope already with waste management &amp; many vulnerable people will find it very very hard.</li> <li>• I am disabled, if my husband is away, I would not be able to take two bags, a box, food bin and main bin down all the steps to the collection point. They may be suitable for increasing recycling and for others but would be a nightmare for me and other mobility restricted people</li> <li>• Placing out potentially 6 bins, that have to be sorted in the week is unsustainable and not viable for elderly and disabled</li> </ul>
Bin Collection concerns	22	2.4	<ul style="list-style-type: none"> <li>• Too much time taken at the side of the road..bin men can't cope with the current collection times</li> <li>• Collection is already unreliable - this adds more complexity. Pilot trials already showing proposal isn't working - collections are being missed</li> <li>• Confidence in the trial was lost when suitable collection vehicles were not available.</li> </ul>
Communal/end of street facility	15	1.7	<ul style="list-style-type: none"> <li>• I live in a small 1 bed flat with a communal bin area</li> <li>• I live in a flat with limited space a communal bin storage area, which when built in the 90s was designed for a refuse collection of that time. These bin areas are now not adequate to take on this new Recycling model.</li> <li>• I have a communal bin store....</li> </ul>
Other	80	8.9	<ul style="list-style-type: none"> <li>• I don't think any of the options proposed will deal with the issues identified. If you are going to add non recyclables to the</li> </ul>

			<p>current system you are still likely to do this in the future.</p> <ul style="list-style-type: none"> <li>• You have incompetent management, sort them out first</li> <li>• There is no need to implement these unworkable changes - the waste collection function needs to be outsourced to a private company.</li> <li>• We pay enough in Council tax for the employees to do the job that they are paid to do</li> <li>• More emphasis should be on manufacturing to reduce their use of non-recyclable packaging</li> </ul>
<b>Total Responses</b>	<b>899</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*

Appendix C - If we were to provide alternative containers for your recycling across the city, which would you prefer – Other

Theme	No.	%	Example Comment
Keep current system	109	25.9	<ul style="list-style-type: none"> <li>• I'm happy with the system we have, if people can't get that right they will never get a new system right.</li> <li>• Keep it as it is. Green bags</li> <li>• best as it is now!!</li> <li>• Green bags which are 76.3% effective.</li> <li>• The current bag system, fill in kitchen, take outside, I've no idea where all this proposed new stuff will be kept.</li> <li>• Stick to the current but increase education and the fine process.</li> </ul>
Wheelie bins / Weatherproof bins	100	23.8	<ul style="list-style-type: none"> <li>• Bins with lids - keeping items fully dry and rats out!!!!!!</li> <li>• Enclosed recycling bins for outside that are weatherproof</li> <li>• Something weatherproof (rain &amp; wind) with a lid that is large enough to contain the amount of recycling.</li> <li>• 2 wheelie bins 1 for plastics and 1 for cardboard and paper</li> <li>• Wheelie bins (something solid plastic...not bags or sacks as these blow away even if weighted)</li> </ul>
Storage concerns	53	12.6	<ul style="list-style-type: none"> <li>• Caddies that can be taken and recycled as consumers do not have to bring and store wet caddies. Not everybody has room or space to bring in wet sacks</li> <li>• Keep to plastic sacks easy to store rather than containers which take up room to store.</li> <li>• Box's with lids as I would have to store outside as no room in house</li> <li>• None of the above - don't have room for them.</li> <li>• At the moment householders don't recycle what make you think this is any better. householders don't have the room in their premises for all these bags especially those who live in flats. this is crazy</li> </ul>
Box/ Stackable Box / Caddy	52	12.4	<ul style="list-style-type: none"> <li>• Boxes for collection but something for inside properties too. IKEA used to sell stackable boxes that had a slanted front</li> </ul>

			<p>which allowed things to be separated while also saving space</p> <ul style="list-style-type: none"> <li>• As above, weatherproofing is essential, so caddies or covered boxes. If concerned about visibility of what's in the containers, why not make the lid transparent.</li> <li>• Stackable boxes with lids.</li> <li>• Collapsible boxes would allow for easier storage and not blow away.</li> </ul>
None	40	9.5	<ul style="list-style-type: none"> <li>• Don't provide alternative containers</li> <li>• None, more of anything is a bad idea. You charge us more every year in council tax and want to give us more jobs to do on top of our day job. Collect all the rubbish and sort it at base.</li> <li>• None of the above keep it as it is</li> <li>• None stick with what we have. I have a full-time job which I'm not giving up to sort waste</li> </ul>
Biodegradable - single use bags	37	8.8	<ul style="list-style-type: none"> <li>• Non-reusable but bio-degradable sacks</li> <li>• Bio-degradable bags which fit into existing bins in people's homes and take up the least storage space. Glass caddies sound like future lawsuits.</li> <li>• Coloured bags such as the green ones used to date in a biodegradable material</li> <li>• Not re-usable as they get dirty and are difficult to clean, both sacks and caddies</li> </ul>
Sack Concerns	25	5.9	<ul style="list-style-type: none"> <li>• Plastic rather than hessian. In windy weather empty hessian sacks will be scattered and lost.</li> <li>• Not re-usable as they get dirty and are difficult to clean, both sacks and caddies</li> <li>• Hessian sacks will get wet when outside and this makes bringing them inside awkward.</li> <li>• None as hessian is hard to wash so becomes nasty and vices and caddies keep blowing away down the street and have smashed</li> </ul>
Community Recycling facility	17	4.0	<ul style="list-style-type: none"> <li>• Recycling points at all supermarkets</li> <li>• Collection bins in neighbourhoods e.g.in supermarket carparks/areas in local parks.</li> </ul>



			<ul style="list-style-type: none"> <li>• A community recycling point that is emptied regularly</li> </ul>
Dependent on property	14	303	<ul style="list-style-type: none"> <li>• Mix of all 3 depending on the property</li> <li>• I'm not convinced by a one size fits all approach. Some will generate more than will easily fit into the containers provided, others might not generate much</li> <li>• What's most suitable for specific households and their situation and space</li> </ul>
Will result in a rise in general waste/ fly tipping	15	3.6	<ul style="list-style-type: none"> <li>• You know full well this will just increase fly tipping. People haven't got the space for this stuff.</li> <li>• I will not be storing my recycling separately; I am pleased to recycle but it will now all be going in one bin</li> <li>• None of these. I would recycle less. I don't have room to store any more boxes.</li> </ul>
Bin men concerns	9	2.1	<ul style="list-style-type: none"> <li>• Something that I don't have to search the streets for after the bin cowboys have thrown them down the street</li> <li>• Hessian sacks are a waste of space. They will get soaked and be strewn everywhere especially on bin day when bin men empty them and chuck them anywhere like they do the white garden waste bags</li> </ul>
Simpler the better	8	1.9	<ul style="list-style-type: none"> <li>• If you make recycling complicated people won't do it. It's convenient to have 2 bins in your kitchen one recycling, one landfill but people won't sift through bins to recycle</li> <li>• Your question is leading and does not allow for a negative answer. I am happy with all recycling going into one bag to be sorted by the council.</li> </ul>
Other	55	13.1	<ul style="list-style-type: none"> <li>• it's not our issue. We commence the recycling by passing the materials to you and it's actually your job to get the recycling done!</li> <li>• Seems to me you are looking for free advice! Look at the existing system, improve this first before going into costly changes! For instance, when was the last time you re-educated households? Never! If people were aware that tearing boxes up rather than putting them in whole, would minimise the use of green waste</li> </ul>

			<p>bags so less expenditure, less bags more efficient pickup! By the way, small food bags are enclosed within an outer bag! What is the point of that? Jumbled thinking!</p> <ul style="list-style-type: none"> <li>• I would like a chance to see in person and vote that way - perhaps a well-publicised neighbourhood consultation to see the options.</li> <li>• I would rather you sorted the waste as that's what I spend council tax for</li> <li>• Keep current system and educate and fine to improve quality</li> </ul>
<b>Total Responses</b>	<b>421</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*

## Appendix D - How do you currently store your recycling before collection – Other

Theme	No.	%	Example Comment
Outside property- Garden / Drive	823	90.8	<ul style="list-style-type: none"> <li>• Keep full bags in front garden next to bins.</li> <li>• store full bags outside until collection day</li> <li>• In the garden in bags</li> <li>• In the front space of the property, outside</li> <li>• Leave outside house on drive</li> <li>• Just leave them outside the back door</li> <li>• They sit outside in the yard because I have no other space</li> <li>• In my side garden, where it is not seen.</li> <li>• Outside house on private sheltered area</li> <li>• store outside behind garden gate on path</li> </ul>
Inside property	62	6.8	<ul style="list-style-type: none"> <li>• Store them in an open container in the house then bag for collection.</li> <li>• I have an internal bin for recycling alongside my internal bin for non-recycling. They are designed to be attractive and sit next to each other in my kitchen.</li> <li>• Normally we produce less than one recycle bag per week, so it can stay in its container until it's ready to go.</li> <li>• Indoor bins in bin bags</li> <li>• Store in box in kitchen and transfer to green bag the night before collection.</li> </ul>
External Storage unit - large bins/ Shed/Garage/	24	2.6	<ul style="list-style-type: none"> <li>• Store in my own purchased bins</li> <li>• My sheds out my back garden</li> <li>• Built storage units in drive</li> <li>• Store excess cardboard in garage or external container until dry collection day</li> </ul>
Communal Bins	22	2.4	<ul style="list-style-type: none"> <li>• Living in a flat, communal bin store.</li> <li>• Keep in cupboard until full then in communal bins</li> <li>• Building has a bin room</li> <li>• Apartment building bin store</li> </ul>
Other	12	1.3	<ul style="list-style-type: none"> <li>• Black bin the lot</li> <li>• We sort into the correct containers on the day before collection.</li> <li>• For homes with space outdoor bins would be useful. For flats shared bins</li> </ul>
<b>Totals Responses</b>	<b>903</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*

## Appendix E - Where do you go to access information about the correct materials to put into recycling bags – Other

Theme	No.	%	Example Comment
Council correspondence	38	31.1	<ul style="list-style-type: none"> <li>• Leaflet delivered with sacks and caddy</li> <li>• On trial and use booklet provided.</li> <li>• Refer to the Leaflet that was put through the door - keep it on the side of the fridge</li> <li>• Booklet</li> </ul>
Online / social media	21	17.2	<ul style="list-style-type: none"> <li>• Cardiff council Facebook</li> <li>• Wales online</li> <li>• Wales Recycles</li> <li>• Recycle Now</li> </ul>
I know what materials recycled/ Recycle what I think is correct	20	16.4	<ul style="list-style-type: none"> <li>• I know what goes where</li> <li>• Common sense</li> <li>• Just put what I think can be recycled into green bag</li> <li>• Make own decisions.</li> </ul>
Previous advice issued	10	8.2	<ul style="list-style-type: none"> <li>• Don't look been using same info for number of years</li> <li>• Poster on my fridge printed in 2018</li> <li>• We had a printed list from the council a couple of years ago</li> </ul>
Look at packaging or recycling sacks/bins	8	6.6	<ul style="list-style-type: none"> <li>• I look at the item</li> <li>• Red and blue sacks. Blue bottle bin</li> </ul>
Work(ed) for Cardiff Council	5	4.1	<ul style="list-style-type: none"> <li>• I already know about recycling from my employment with Cardiff Council</li> <li>• I work within Waste Management</li> </ul>
Text/email	5	4.1	<ul style="list-style-type: none"> <li>• Receive text from council</li> <li>• Email advice from Community Council</li> </ul>
Ask Friend / relative	4	3.3	<ul style="list-style-type: none"> <li>• My wife</li> <li>• Ask a friend to go online for me &amp; check.</li> </ul>
Other	20	16.4	<ul style="list-style-type: none"> <li>• Everything goes in the green bag; the council can separate if they wish to do so.</li> <li>• Library</li> <li>• Local litter picking group</li> <li>• local shop</li> </ul>
<b>Total Responses</b>	<b>122</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*

Appendix F - If you don't know whether an item can be recycled in your green bags, what do you do with it – Something else

Theme	No.	%	Example Comment
Put in Black Bin / Green Bags	31	42.5	<ul style="list-style-type: none"> <li>• Make a judgement to put it in green bag or black bin</li> <li>• I make every effort to recycle but the. It has to go in the black bin if no joy.</li> <li>• Put them in the general waste bin</li> <li>• Guess - black bin or green bag</li> </ul>
Find out information myself	30	41.1	<ul style="list-style-type: none"> <li>• Check the product packaging</li> <li>• check on website</li> <li>• Look online to see where it goes</li> <li>• Ask neighbours</li> </ul>
Take to recycling centre / Similar Scheme	12	16.4	<ul style="list-style-type: none"> <li>• Depends what it is, household recycling centre or other scheme</li> <li>• Teracycle</li> <li>• Google to find out where it can be recycled taking advantage of volunteer run tetracycline schemes in the community</li> </ul>
Other	10	13.7	<ul style="list-style-type: none"> <li>• We are trialling the new 3 bag system</li> <li>• Varies depending on what the item is</li> </ul>
<b>Total Responses</b>	<b>73</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*

Appendix G - Do you think the Council does enough to inform residents about how and what to recycle? If no, or if you have any comments, how could we improve this – Other

Theme	No.	%	Example Comment
Clearer/Accurate/more accessible information	156	62.9	<ul style="list-style-type: none"> <li>• It seems really complicated what can and can't be recycled. Is there a way of simplifying this information to make it clearer.</li> <li>• Improve the recycling website for more comprehensive information</li> <li>• More posts on social media groups (i.e., FB reuse groups) and radio</li> <li>• On website have a search facility where u can enter items name and it can then advise correct recycling process</li> <li>• Email residents when their collection is due with an attachment of what goes in the green bag</li> <li>• A fridge magnet or something that isn't just going to end up being lost or recycled</li> <li>• Work with large stores to have information on what can and can't be recycled.</li> </ul>
Recycle more items /More improved recycling centres	36	14.5	<ul style="list-style-type: none"> <li>• Provide teracycle bins</li> <li>• Find a way to recycle things that currently can't be recycled</li> <li>• Have more places to recycle tetra packs and plastic that can be recycled with carrier bags. Also, more places for batteries</li> <li>• Have a permanent hire in North Cardiff. Just Saturdays for a limited time frame and limited materials not good enough!</li> </ul>
Educate/show benefits of recycling/ Not fines	25	10.1	<ul style="list-style-type: none"> <li>• Indicate on sacks which are left by your operatives, the reason why they're left and stop fining people, unless their actions are grossly taking the mick.</li> <li>• Stop issuing fines as it does not act as a deterrent, improve education</li> <li>• Better understanding how how incorrect/contaminated waste means whole bags need to be destroyed.</li> <li>• No fines - plenty of residents dump their rubbish in the wrong bin knowing others</li> </ul>

			get the blame. Education and constant messaging is the answer.
Fixed Penalties / Inspections / Enforcement	10	4.0	<ul style="list-style-type: none"> <li>Legislate to force supermarkets to only use recyclable packaging</li> <li>Most of the people not recycling are tenants. Mine are absolutely terrible at it! Letters need to go out to all tenants stating that they are at risk of losing their tenancy if recycling is not carried out. Work with us landlords closer to initiate this.</li> <li>ACTIVE BIN INSPECTIONS &amp; ENFORCEMENT.</li> </ul>
Engage more with areas of low recycling	9	3.6	<ul style="list-style-type: none"> <li>Engage with the elderly as many of them find the recycling system very confusing. Also target student/landlord/holiday accommodation.</li> <li>Much more focus should be on students. As a homeowner with post graduate lodgers most of them don't have a clue!</li> </ul>
Social Exclusion - Age / Disability / Digital resources	8	3.2	<ul style="list-style-type: none"> <li>we get a lot of calls from elderly people or people with no social media they don't know what's going on and find it hard to find out also people live alone no friends or family</li> <li>not everybody has access to a PC or other device to check websites or to use social media</li> </ul>
More reliable bin collections	7	2.8	<ul style="list-style-type: none"> <li>Collect recycling on time</li> <li>Collect the rubbish on the day. Do NOT skip collections</li> </ul>
Incentives	6	2.4	<ul style="list-style-type: none"> <li>Positive reinforcement prizes for households who manage their recycling in an excellent</li> <li>The council could also put gold stickers on bins that are consistently filled with the correct recycling waste; the carrot is much better than the stick approach!</li> </ul>
Other	24	9.7	<ul style="list-style-type: none"> <li>The council should find out what the shops are supplying the food in and ensure the correct service is available.</li> <li>Provide better storage for recycling, the plastic bags are weak, break and just aren't suitable</li> <li>Stop expecting residents to do the job they paid council tax for! Provide greater, more appropriate bin capacity, regular, reliable</li> </ul>

			<p>collections. Residents will then be able to self-sort waste into the correct bin</p> <ul style="list-style-type: none"> <li>• I have no idea what's best, people don't care enough on the whole to find out, don't bother reading leaflets through the door &amp; are happy to leave it to your staff to deal with if they get it wrong. Drives me nuts!!</li> </ul>
<b>Total responses</b>	<b>248</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*



Appendix H - Do you think we should introduce an annual charge of £35 for fortnightly garden waste collections, between March-November? This would be approximately £1.80 per collection. Residents would need to sign up and pay each year. If you have said yes, why – Other

Theme	No.	%	Example Comments
Could incentivise composting	10	28.6	<ul style="list-style-type: none"> <li>• It might encourage people to compost their own garden waste.</li> <li>• If people have gardens should there be an initiative to encourage them to compost rather than fill garden waste bins maybe that's an option provide them with a composted if they pay for pickups.</li> <li>• That would encourage composting — which is what I do. I do actually use the. garden waste collection about twice a year, if that.</li> <li>• To encourage. composting — which is what I do with nearly all my garden waste.</li> </ul>
Happy to pay	7	20.0	<ul style="list-style-type: none"> <li>• I have garden waste all year round and happy to pay for extra collections.</li> <li>• The current service is hit and miss, with many missed collections and large gaps. As a paid for service, I would expect the quality of service to have to improve.</li> <li>• I previously lived in Cheltenham and an annual charge worked well.</li> </ul>
Would want more collections if paying	6	17.1	<ul style="list-style-type: none"> <li>• To be specific if I pay a fee, I expect collections to occur over winter as well just less regularly. It's a non-statutory service and I understand the council needs to invest money elsewhere. If the charge was anymore, I wouldn't be happy at all. Also just to note I think this has the potential to make garden waste recycling class divide.... Had the social implications been considered for charging?</li> <li>• To make sure it is taken - fed up with being missed.</li> </ul>
Risk of fly tipping	4	11.4	<ul style="list-style-type: none"> <li>• Risk of fly tipping if no regular service. We already take ours to the tip and are applying for a second green bin. We already pay very high rates here.</li> <li>• I don't want to see it thrown as fly-tipping.</li> </ul>

Have no car / can't attend HMRC	3	8.6	<ul style="list-style-type: none"> <li>I'm a pensioner and don't have a car.</li> </ul>
Pay as you go system	2	5.7	<ul style="list-style-type: none"> <li>I think you should offer it on a pay as you go basis like the additional collection bags cost would pay for it but I think paying monthly wouldn't suit everyone.</li> </ul>
Waste from surrounding properties / street	2	5.7	<ul style="list-style-type: none"> <li>We get a lot of leaves from the park opposite, why not go to monthly collections in October/November and December. Also we currently put green recycling out every other month.</li> </ul>
Misc.	17	48.6	<ul style="list-style-type: none"> <li>Paying for the service should weed out those misusing it - weed out - ho ho!</li> <li>Not a reason but a comment, if this is done there should be a low-income scheme for families who are in receipt of a means tested benefit (Inc. Pension credit).</li> <li>The wealthiest people are being subsidised with free garden waste collection. They need to start practicing a closed system where they make sensible choices so that they recycle their garden waste in their own gardens.</li> <li>I am NOT satisfied that green waste has been sitting in my bin since November and that when it is collected the bin is likely to break with its weight as it has compacted, and I have had to add to it. I want an all-year-round collection. We have many trees with TPO's and we need this assistance.</li> </ul>
<b>Total Respondents</b>	<b>35</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*

Appendix I - Do you think we should introduce an annual charge of £35 for fortnightly garden waste collections, between March-November? This would be approximately £1.80 per collection. Residents would need to sign up and pay each year. If you have said No, why – Other

Theme	No.	%	Example Comments
May increase fly tipping / burning / incorrectly presented waste / using other receptacles	137	39.5	<ul style="list-style-type: none"> <li>• It will result in waste being fly tipped.</li> <li>• I worry that people may just dump this waste instead or put in black bags.</li> <li>• I would not mind paying the fee but think it would encourage some people not to recycle green waste and burn it or put it in black bin. You could have a free opt-in service in which people have to register every year if they want collections.</li> <li>• It will probably just get fly tipped somewhere if there is a charge.</li> <li>• Will lead to people burning garden waste in their garden which will increase CO2.</li> </ul>
Pay enough council tax at present	58	16.7	<ul style="list-style-type: none"> <li>• I feel I pay enough for my council tax.</li> <li>• My council tax is already inflated enough, and I should get at least some services for my payment.</li> <li>• Refuse collection is the ONLY obvious service we get from the council for the extortionate council tax we already pay.</li> </ul>
Not prepared to pay	50	14.4	<ul style="list-style-type: none"> <li>• Cardiff residents would not pay for their collections, the majority believe that they pay their Council tax and the only service they receive is their waste collections, so asking them to pay more will not go down well.</li> <li>• I wouldn't want to pay for fortnightly collections when I didn't need them that often - an option to pay for a single collection would be preferable, and pinpoint collection locations too.</li> <li>• If you start charging for this service a lot of people will not pay and will just start dumping elsewhere. It should already be included in the extortionate council tax that we already pay.</li> </ul>

Potential to affect those that cannot afford it	44	12.7	<ul style="list-style-type: none"> <li>This will be an extra cost that some household won't be able to justify. Although there will be some correlation between income and whether a household has a garden this won't be clear cut. Those who don't care about recycling or don't want to pay for this may refuse to and may end up fly tipping their garden waste.</li> <li>This would disadvantage low-income families.</li> </ul>
Service very poor at present	40	11.5	<ul style="list-style-type: none"> <li>Garden waste has not been collected since we moved into the area in December. This is not acceptable when this survey and your website indicate it should be monthly collections.</li> <li>Given how poor green waste collections have been over the last two years and how expensive council tax already is, charging more would be very disappointing.</li> </ul>
Should not be taxed / penalised for having green space / they should be protected not concreted	33	9.5	<ul style="list-style-type: none"> <li>Gardens &amp; green spaces are vital for our biodiversity- we should not be penalised for having green spaces.</li> </ul>
Access to recycling centre - limited to car users	29	8.4	<ul style="list-style-type: none"> <li>You are punishing people who don't have a car. I'm greener than car users but can't take my waste to a centre. Council tax is high enough already. People may end up putting it in general waste. Not a good idea.</li> </ul>
Waste from other properties / street / trees etc.	28	8.1	<ul style="list-style-type: none"> <li>Where I live the major contributor is leaf fall from trees on council property however, unlike some areas where the council sweep up leaves it's left to homeowners to clear the leaves from the roads, pavements and communal areas.</li> </ul>
Not value for money	20	5.8	<ul style="list-style-type: none"> <li>I would pay if it was worth it to me, but it isn't. Please provide other options. Tips are miles</li> </ul>

			away and you have to book. It encourages fly tipping.
It will discourage recycling	19	5.5	<ul style="list-style-type: none"> <li>It would discourage people from recycling their garden waste.</li> </ul>
Different properties have different needs	16	4.6	<ul style="list-style-type: none"> <li>Do the bands that define the level of council tax take into account house and garden size.</li> </ul>
I may be prepared to pay	15	4.3	<ul style="list-style-type: none"> <li>I would be content to pay a small additional charge per collection, but as I Probably only put my green bin out 5 times a year, each collection would cost me £7 if the £35 fee was introduced. With a flat annual rate there is no incentive for me to reduce my overall collections.</li> </ul>
Change collection frequency	14	4.0	<ul style="list-style-type: none"> <li>I think we need more collections over the autumn and winter - every two weeks, to cope with leave fall. Perhaps tailing off in February.</li> </ul>
Need a new free scheme / opt in / utilise technology	12	3.5	<ul style="list-style-type: none"> <li>Suggest a third way - require people to sign up via an app in a window (say, 24-72 hours) prior to collection time when they want their green waste collected. Then no need to charge, but you could reduce/streamline collection. I'd also be happy to put my green bins at the end of the road alongside everyone else's from my postcode, so collection spots are far fewer.</li> </ul>
What about associated costs of scheme / management - and to remedy those that fly tip	11	3.2	<ul style="list-style-type: none"> <li>The cost of admin cost of collecting the fee could outweigh the benefits, simpler would be to add to Council Tax although not all get the benefit this is how tax works.</li> </ul>
I use the service irregularly	11	3.2	<ul style="list-style-type: none"> <li>I have a very small garden and only use garden waste once a year, for me this would mean £35 for one collection.</li> </ul>
Misc.	78	22.5	

			<ul style="list-style-type: none"> <li>• Lack of HRC in north Cardiff.</li> <li>• Neighbouring local authorities do not charge.</li> <li>• The material is, I assume used to make compost to enhance public spaces. Without it the council would need to buy compost or let the public spaces get even worse than they are.</li> <li>• I would like to know what happens between November and March.</li> <li>• The council wastes money on things like painting rainbow colours on the road - if it has money for non-essential, attention-seeking nonsense it has money to recycle garden waste.</li> </ul>
<b>Total Respondents</b>	<b>347</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*

## Appendix J - Do you bring any garden waste to a Household Recycling Centre? If no, why – Other

Theme	No.	%	Example Comment
Lack of Household Recycling Centre's in Cardiff / Environment Concerns / Distance and time needed to travel	119	41.3	<ul style="list-style-type: none"> <li>• There is no local hwrc in the north of Cardiff ridiculous to expect people to drive across the city to dispose of it</li> <li>• The recycling centre is some distance now that Wedal Road is closed - using a car for this purpose is contradictory to the Council's greener city policy</li> <li>• I live in North Cardiff and the nearest centre is over 10 miles away, which I vehemently disagree with for both time and environmental reasons. There should be a recycling facility for north Cardiff.</li> <li>• You want us to travel miles across the city with a car full of stinking garden waste because you have closed Wedal Road and Waungron for us Cardiff North residents...pull the other one.</li> <li>• I am sure that 200+ cars travelling to the recycle centre produced more carbon dioxide than kerb collections</li> <li>• It's very difficult to get to the tip from here, right across the other side of Cardiff. If there was a collection point closer, I might use it</li> </ul>
Use home composter	39	13.5	<ul style="list-style-type: none"> <li>• We are lucky enough to have a garden and allotment. We use as much of our garden waste as possible to compost</li> <li>• I don't have much and I turn it all into compost. Good for the flowers see butty</li> <li>• I compost at home using a council supplied top load bottom output compost bin</li> <li>• I don't have to, I am able to compost</li> </ul>
Minimal / No Garden Waste	36	12.5	<ul style="list-style-type: none"> <li>• No garden waste - live in a flat</li> <li>• I don't have a garden.</li> <li>• I have Astro turf and patio, so no garden waste</li> <li>• Not enough waste to worry about</li> </ul>
Booking appointment concerns	25	8.7	<ul style="list-style-type: none"> <li>• Having to go through a process on having to book a slot - is a nightmare!!</li> <li>• Stupid booking in system if you are late, you can't go in</li> <li>• Only Limited number of visits to centres are allowed and wouldn't want to waste them on my garden waste</li> </ul>

			<ul style="list-style-type: none"> <li>The sites are not open at reasonable hours for the working residents. Sites could be run on shifts</li> </ul>
Don't have access to car / Car too small to transport garden waste	24	8.3	<ul style="list-style-type: none"> <li>Small sports car with small boot</li> <li>Unable to has partner works long hours and I don't drive</li> <li>not everybody has transport.</li> </ul>
Use kerbside collection	13	4.5	<ul style="list-style-type: none"> <li>The green bin is the perfect all-round solution so please leave it as it is</li> <li>Currently never have more than fits in my green bin</li> <li>I don't produce that much garden waste and what I do produce can go into my green bin.</li> </ul>
Council Tax should cover this	8	2.8	<ul style="list-style-type: none"> <li>It's what we pay our rates for ... SERVICE!</li> <li>My rate bill of £220 per month should be enough to provide for you to collect my green bin every fortnight through the year, not just once a month in the winter..</li> </ul>
Don't want mess/ insects in car	5	1.7	<ul style="list-style-type: none"> <li>I don't want creepy crawlies in my car which would be inevitable if I had to</li> <li>Semi decomposed waste is not viable to transport in a car</li> </ul>
Fly-tip	4	1.4	<ul style="list-style-type: none"> <li>It counts towards amount of times I can visit the dump - easier to fly tip and wait for council to clear it up</li> </ul>
Dealt with by Landlord / Housing Association	3	1.0	<ul style="list-style-type: none"> <li>Block of flats maintenance including gardening is managed by the housing association and I am unsure how they dispose of the waste but know it is not added to the communal bins.</li> </ul>
Other	30	10.4	<ul style="list-style-type: none"> <li>never heard of a household recycling centre</li> <li>Paid for a gardening service to remove it</li> <li>I never knew that was an option</li> <li>Full time worker with no time to take on this task</li> </ul>
<b>Total Responses</b>	<b>288</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*



Appendix K - If you weren't sure whether an item should be included in your garden waste collections, what would you be most likely to do with it – Other

Theme	No	%	Example Comment
Compost it	23	24.7	<ul style="list-style-type: none"> <li>• Make use of it in the garden or compost it</li> <li>• I have a compost bin in the garden.</li> <li>• Use my allotment compost bins</li> <li>• composting as much as possible</li> </ul>
Green bin/ Confident what can go in garden waste collections	22	23.7	<ul style="list-style-type: none"> <li>• I know what can go in a green bin</li> <li>• Personally, I'm pretty clear about what is / isn't permitted so don't face that dilemma.</li> <li>• As a gardener I know what can be recycled</li> <li>• I know what goes in Garden waste, so it isn't an issue</li> </ul>
Look it up / Ask Friends / Neighbours	16	17.2	<ul style="list-style-type: none"> <li>• check Council website. Ask family/ friends</li> <li>• Attempt to get clarification from Council.</li> <li>• Ask manager of property where I live</li> </ul>
Don't have garden waste	11	11.8	<ul style="list-style-type: none"> <li>• I have no garden</li> <li>• I don't have any garden waste</li> </ul>
Put in general waste bin	7	7.5	<ul style="list-style-type: none"> <li>• Find out how to recycle it and then put in the black bin if not easy to recycle - depends on item</li> <li>• When I can't reuse, I put it into my general waste bin in small amounts.</li> </ul>
Burn it	6	6.5	<ul style="list-style-type: none"> <li>• If it's true garden waste, burn it</li> <li>• I often reuse things in my garden such as soil as best as I can. We have log burner fires in the kitchen and in the garden so we can make use of untreated wood in this way.</li> </ul>
Depends on item	4	4.3	<ul style="list-style-type: none"> <li>• It depends what the item is</li> </ul>
Food waste caddy	3	3.2	<ul style="list-style-type: none"> <li>• If small and biodegradable, then put in food waste eg flowers.</li> </ul>
Other			<ul style="list-style-type: none"> <li>• Arrange for third party to take it away</li> <li>• Throw it over the fence</li> </ul>
<b>Total Responses</b>	<b>93</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*

## Appendix L - What actions should be taken against residents that misuse the service – Other

Theme	No.	%	Example Comments
Greater implications for repeat offenders	80	31.9	<ul style="list-style-type: none"> <li>• Possibly a sliding scale if education doesn't not work. Possibly told x number of times, then fine and removing service.</li> <li>• By all means education and support, but penalty for repeat 'offenders'.</li> <li>• Needs a phased approach, starting with education escalating to fines and ending with a temporary removal of services. But to be effective needs to be tailored to individual needs. Probably not an affordable solution though.</li> <li>• Warnings to be given in that order, education, fine and removal of service if continued rule breaking.</li> </ul>
Nothing	39	15.5	<ul style="list-style-type: none"> <li>• No action should be taken as fly tipping is a bigger costly problem.</li> <li>• The council should accept some errors.</li> <li>• Nothing - do not always look for an opportunity to fine or remove services.</li> </ul>
Concerns around identifying the correct households / individuals	26	10.4	<ul style="list-style-type: none"> <li>• I have seen children put litter in garden waste bins as they walk to or from school.</li> <li>• Investigate why an item is there - it could be from a neighbour.</li> <li>• My concern with fixed penalty notices in general is that 3rd parties could contaminate someone's perfectly acceptable waste caddy/bag/whatever as they pass by or even maliciously. Stopping waste collections due to the thoughtlessness of individuals who hide other material in bins/bags affects the majority who are not at fault.</li> </ul>
Knock on door / get greater understanding of why people are	23	9.2	<ul style="list-style-type: none"> <li>• Be more understanding of individual property difficulties and assist on an individual basis where needed.</li> </ul>

misusing the service			<ul style="list-style-type: none"> <li>Punitive measures are pointless. A visit to the house by the individual who does the collecting, and some backup literature would help. Threats are counterproductive as offenders will react angrily.</li> </ul>
Concerns around current service	22	8.8	<ul style="list-style-type: none"> <li>Much of the misuse is due to collections being irregular and too few. Further reducing collections/charging further fees/implementing penalties is a joke. My collections are rarely on time and sometimes not at all, this causes a build-up of trash and street pollution. Get your house in order before imposing restrictions on waste collection I already pay for in council tax.</li> <li>Make your service fit for the purpose of serving the public who pay the council tax. You are there to help us.</li> </ul>
Smaller fine	11	4.4	<ul style="list-style-type: none"> <li>£5 Fixed Penalty Notices as £100 is too extreme for having garden vegetation rubbish taken away.</li> </ul>
Provide a clearer understanding of the service	11	4.4	<ul style="list-style-type: none"> <li>A booklet should be given to show what bin any sort of item should go in. I know a list is on your website, but no one can be bothered to go on it and look it up. Having a booklet to hand will increase compliance.</li> </ul>
Confusion how service is misused	4	1.6	<ul style="list-style-type: none"> <li>How on earth can a garden waste collection "service" be misused?</li> </ul>
<b>Sliding Scale fines</b> - The more you earn the more you pay	3	1.2	<ul style="list-style-type: none"> <li>Stop charging poor residents for making mistakes.</li> </ul>
Don't empty the bin	3	1.2	<ul style="list-style-type: none"> <li>Do not collect waste, put a sticker on the bin informing the owner that they need to sort it out.</li> </ul>

Provide more HRC's / local drop off points	3	1.2	<ul style="list-style-type: none"> <li>Local (and they would need to be very local) collection sites might be possible/sensible in some parts of the city. But the sites would need frequent emptying.</li> </ul>
Depends on item placed in bin	2	0.8	<ul style="list-style-type: none"> <li>If it was crystal clear that it wasn't garden waste (e.g. nappies) it should be a fine.</li> </ul>
Misc.	33	13.1	<ul style="list-style-type: none"> <li>Charge more council tax for landlords.</li> <li>The Council should be 'educated' how to deal with the public. You really should not use this term. I don't need education on this, but I would need help in the future on putting these bins out.</li> <li>A fine balance between encouraging compliance and avoiding fly tipping.</li> <li>£100 reward.</li> </ul>
<b>Total Respondents</b>	<b>247</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*

## Appendix M - Do you participate in food waste collections? If no, why not – Other

Theme	No.	%	Example Comments
Hygiene / Vermin concerns	13	28.3	<ul style="list-style-type: none"> <li>• There is a massive rat problem in my area, and it was attracting even more as waste container is kept outside in communal area.</li> <li>• Attracts flies.</li> <li>• By the time I generate enough to fill a caddy it is rotting and unhygienic.</li> <li>• Encourages flies and rats.</li> </ul>
Have a waste disposal unit / compost it	12	26.1	<ul style="list-style-type: none"> <li>• I use a sink waste disposal unit for small items and only use the council system for such a bones. I try not to waste food.</li> <li>• I have a sinkerator for non-compostable food waste and a compost heap.</li> <li>• I have a waste disposal unit in my sink.</li> <li>• We have a dog who has learned how to get into the food bin. I home compost.</li> </ul>
Don't generate enough food waste	6	13.0	<ul style="list-style-type: none"> <li>• I do not waste enough food to warrant collecting. It would take months to produce one bagful.</li> <li>• I have minimal food waste. If required (very, very occasionally) I can use my waste disposal unit.</li> <li>• As I live alone, I find I produce very little food waste and it is just a little too much hassle for me to worry about. In the black bin it goes.</li> </ul>
Collection issues	5	10.9	<ul style="list-style-type: none"> <li>• Sick and tired of retrieving my bin that your collectors have thrown randomly down the street.</li> <li>• My food waste has been missed a few times, even though it was reported, I then would have to wait a week for a collection. It resulted in very stinky bins and no space to be able to place the second weeks waste. I have given up and place it in my black bin. This is because of the poor service from the council.</li> </ul>
Storage issues	4	8.7	<ul style="list-style-type: none"> <li>• I live in a flat and do not have space for the extra bin.</li> </ul>
Concerns around bags / caddies	4	8.7	<ul style="list-style-type: none"> <li>• Caddy bins and the green bio bags are not robust enough, the green bio bags split making a mess on the</li> </ul>

			kitchen floor, and as i don't have much waste mostly crumbs it's not feasible to have a caddy being kicked around the room.
Misc.	9	19.6	<ul style="list-style-type: none"> <li>• I have tried - but I am very bad at it and it goes manky in the bin.</li> <li>• I don't know when food waste collections are in my area or if we even have them.</li> <li>• No legal requirements.</li> </ul>
<b>Total Respondents</b>	<b>46</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*

## Appendix N - What would encourage you to participate, or participate more regularly in food waste collections – Something else

Theme	No.	%	Example Comments
Don't generate enough food waste / Compost what I have	59	33.7	<ul style="list-style-type: none"> <li>• If I was not living alone and generated enough food waste, I would use the service.</li> <li>• I have very little food waste. I compost any peelings.</li> <li>• We strive to avoid food waste in the first place and generally produce the minimum of food waste. Peelings etc. go onto our own compost bin.</li> <li>• I compost my own food waste so only need a fortnightly collection.</li> <li>• We waste so little food that the caddy was horribly smelly by the time it needed emptying.</li> </ul>
<b>Improved Caddie Design</b> - Larger / Lockable	29	16.6	<ul style="list-style-type: none"> <li>• Improved design of caddies e.g. ones that actually lock and can't be broken into by seagulls, causing mouldy bread to be scattered everywhere.</li> <li>• Bigger kerbside caddy - as a family of 6 we offer have no room left on day 5, so up end storing a bag until collected and hoping the next week is less wasteful.</li> <li>• A 30% increase in kerbside caddy capacity.</li> <li>• Food caddy is too small and the lids aren't very well fitting which allows for flies and maggots in the hot weather.</li> </ul>
Concerns around collections / Bin men	21	12.0	<ul style="list-style-type: none"> <li>• Have the bin men actually collect them and also not throw the caddy's down the street.</li> <li>• Actually collecting the caddy's would be a good start!</li> <li>• The council to actually empty the communal food bin.</li> </ul>
I already participate	9	5.1	<ul style="list-style-type: none"> <li>• No encouragement - I participate only when I have something to recycle.</li> </ul>
Communal food waste bin suggestions	9	5.1	<ul style="list-style-type: none"> <li>• Having a communal food waste bin locally so I don't have to keep it on my property attracting rats.</li> </ul>

Incentives	8	4.6	<ul style="list-style-type: none"> <li>Rewarded with payment, vouchers or reduced council tax.</li> </ul>
Greater Education needed	8	4.6	<ul style="list-style-type: none"> <li>Sanctions don't help people. Education and reward are proven methods of encouragement that work.</li> </ul>
Concerns around bag quality	7	4.0	<ul style="list-style-type: none"> <li>Stronger bags that don't break!</li> </ul>
Availability of food bins / bags	7	4.0	<ul style="list-style-type: none"> <li>Faster response in replacing caddy's. 2-3 weeks when a bin is lost, stolen, or vandalised makes it hard to continually use the service.</li> </ul>
Nothing	6	3.4	<ul style="list-style-type: none"> <li>Nothing would encourage me to recycle food waste! It's unhygienic!</li> </ul>
Misc.	18	10.3	<ul style="list-style-type: none"> <li>I've got two dogs. They are 100 percent efficient in consuming food waste!</li> <li>I'd rather improve my other recycling.</li> <li>Bin cleaning services. Not being charged when the council break or lose bins.</li> </ul>
<b>Total Respondents</b>	<b>175</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*



## Appendix O - Are there any further improvements you would like to see at the Household Recycling Centres – Other

Theme	No.	%	Example Comments
<b>Better Accessibility</b> - Vans / Cyclists / Pedestrians	108	28.1	<ul style="list-style-type: none"> <li>• Better access for residents without cars.</li> <li>• Let cyclists with bike trailers use the centres.</li> <li>• Completely inaccessible to people without cars. People without cars are penalised yet they are taking the biggest steps for our environment. It is frustrating to be told that we need to do more ecologically when we are already making the biggest green sacrifice by not running a car and thus facilities are not available to us.</li> <li>• Allow those without cars (i.e. on bicycles) to be able to use the centres.</li> <li>• Recycling provision throughout the city is poor. Accessibility and location need to be improved.</li> </ul>
Concerns around lack of Household Recycling Centres in Cardiff	77	20.0	<ul style="list-style-type: none"> <li>• The promised recycling centre in North Cardiff.</li> <li>• Stop selling off recycling centres and replace them asap.</li> <li>• You took away the centre on wealth road and it now takes me an hour round trip if I am able to do it myself.</li> <li>• Large centre in north Cardiff not the pretend one proposed in Llanishen.</li> </ul>
Return of general waste tipping	42	10.9	<ul style="list-style-type: none"> <li>• Opportunity to throw general household waste.</li> <li>• Bring back general waste tipping. Even if for a limited amount per household. Taking the function away does not mean it ceases to exist!!</li> <li>• More scope for general non recycling waste to be taken for when you are having a sort out.</li> </ul>
Staff Issues / concerns	31	8.1	<ul style="list-style-type: none"> <li>• Currently none of the site attendants appear to be willing to assist lone residents unload their vehicles.</li> <li>• Less rude, unhelpful, obstructive behaviour from staff at Lamby way would be nice.</li> </ul>
Better signage / Site plans / info before visit	30	7.8	

			<ul style="list-style-type: none"> <li>• A plan of the recycling centre so that I can see which bins are where. This could be online or on site and would save time when looking for the right bin.</li> <li>• Information on what to separate before attending the sites. That way we could pre-sort at home rather than picking through the items at the recycle centre.</li> </ul>
Greater Recycling Facilities / Less waste streams	25	6.5	<ul style="list-style-type: none"> <li>• Being able to recycle more items at these centres, such as food waste and plastic bags (currently only offered in some supermarkets), plus other unusual things like toners/ink cartridges. No reason why nearly all waste can't be separated and either recycled or disposed of in a better way.</li> <li>• Recycling of tetra packs at Lamby way - we currently have to drive across the city to do this, which isn't very environmentally friendly.</li> </ul>
<b>Concerns around restrictions</b> - Site visits / Booking system	21	5.5	<ul style="list-style-type: none"> <li>• You should not need to book; you do not need to keep or process the data. You used to NOT allow for multiple same day bookings - which is useless if you have a day off work to have a clear out. As per - you have introduced too much red tape and layers of admin. Make it free, easy and accessible to all Cardiff residents.</li> <li>• Remove booking, remove the limits.</li> </ul>
Pop up / Temporary collection sites in local communities	17	4.4	<ul style="list-style-type: none"> <li>• Containers across the city, in your local area to take items as 2 centres far from me and cost to travel and not for short trips/ little waste so I could recycle more effectively if we had local bottle, clothes, paper, containers.</li> </ul>
Positive system / staff comments	11	2.9	<ul style="list-style-type: none"> <li>• Customer service at recycling centres excellent.</li> </ul>
Introduce a repair café / second-hand donation site	8	2.1	<ul style="list-style-type: none"> <li>• I see a lot of things being thrown away that could be reused, an onsite shop would be a great way to encourage people not to throw away items in good condition.</li> </ul>
Opening Hours	7	1.8	

			<ul style="list-style-type: none"> <li>• Longer opening hours. I used to be able to drop off waste at a recycling centre either on my way to or from work as they were open 7am to 7pm.</li> </ul>
Concerns around parking facilities / road surfaces	7	1.8	<ul style="list-style-type: none"> <li>• Please remove the need to reverse your car into spaces at Lamby way - it's a nightmare. The old system on the new site was much better.</li> </ul>
Misc.	18	4.7	<ul style="list-style-type: none"> <li>• Recycling Centres are a waste of time.</li> </ul>
<b>Total Respondents</b>	<b>385</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*

## Appendix P - Do you have any further comments in relation to Household Recycling Centres?

Theme	No.	%	Example Comments
Concerns around location / lack of Recycling Centres	216	28.3	<ul style="list-style-type: none"> <li>I live in North Cardiff and am still waiting for the promised recycling centre when it was taken from Wedal Road, and we were told Lamby Way wasn't hard to travel to.</li> <li>Need local recycling centres.</li> <li>It is too far to travel to use the two existing HRC's. There should be a permanent HRC in North Cardiff.</li> <li>Their current locations are not appropriate or the majority of households.</li> <li>Lack of alternative provision when sites have been closed.</li> </ul>
Positive staff / service comments	129	16.9	<ul style="list-style-type: none"> <li>The staff at the sites are always polite and very helpful.</li> <li>The staff are brilliant and super helpful.</li> <li>I think they are very well managed.</li> <li>My mother really appreciated the kind help she got when she took a carload of green + wood waste. Thankyou.</li> </ul>
<b>Remove Restrictions -</b> Booking System / No. of site visits per year	119	15.6	<ul style="list-style-type: none"> <li>The booking system is horrendous. I think it should be removed. The ability to attend whenever you want will increase recycling and compliance.</li> <li>The booking system is too cumbersome and time-consuming. I like to visit recycling centre spontaneously sometimes.</li> <li>In certain situations, multiple visits per day may be required. For example house moves/clearances or major DIY projects or garden clearances.</li> <li>Shouldn't have a limit of how many times you can visit and should remove the pre booking system.</li> </ul>
Better Accessibility	88	11.5	<ul style="list-style-type: none"> <li>There should be some facility that is open to people who don't own cars. I have to save a lot of things which can be recycled, e.g. tetra Pak which are not large, but I can only recycle them if I can drive.</li> </ul>

			<ul style="list-style-type: none"> <li>• They are not a solution for people without cars. Are you taking into account Cardiff is trying to reduce car ownership?</li> <li>• If household recycling centres in Belfast can manage to provide unrestricted access to pedestrians, so should those in Cardiff. Please end this discrimination against taxpayers without a car.</li> </ul>
Negative staff / service comments	45	5.9	<ul style="list-style-type: none"> <li>• The recycling centres are restrictive and many of the staff unhelpful, some even rude.</li> <li>• It's very hard to use when disabled - no support from staff.</li> </ul>
Offer greater recycling facilities	40	5.2	<ul style="list-style-type: none"> <li>• There should be greater ability to recycle polystyrene items, crisp packets and other items that are currently only recycled by specialist providers. I know many people would be happy to store these until ready to recycle at the centres.</li> <li>• Hard plastics and similar items. I've previously been told to throw them in general waste which was annoying after making a special trip. Spring is here. What's happening with flower and plant pots?</li> </ul>
Allow general / mixed waste tipping	39	5.1	<ul style="list-style-type: none"> <li>• Very occasionally households produce more mixed waste than will fit in the small black bins or may be due to go on holiday and miss bin collection date. There should be somewhere to be able to take mixed waste in those circumstances.</li> <li>• Please start taking black bags at the refuse centres and not recycling, I recycle 80% of waste and yet my black bin is still too small and I have one back a week I cannot put in, so I've bought a shed to store access black bin waste in.</li> </ul>
Introduce a repair / reuse centre	28	3.7	<ul style="list-style-type: none"> <li>• It would be nice to have a area for items people think are too good to recycle, perhaps a worker can then sort items or liaise with local charities before they go to the skips.</li> </ul>

Signage / Layout suggestions	27	3.5	<ul style="list-style-type: none"> <li>Visiting the recycling centres seems to have got increasingly complex, which is putting people off going and probably contributing to the terrible amount of fly tipping in the city. We need more centres and for it to be clearer what can be recycled where in each centre. I do want to add that all of the staff at Lamby way are lovely and very helpful!</li> </ul>
Introduce Pop up / Temporary collection sites in local communities	22	2.9	<ul style="list-style-type: none"> <li>More pop-up areas would be welcome such as Ty Glas.</li> </ul>
Introduce a home collection service	12	1.6	<ul style="list-style-type: none"> <li>I'd love to have help to use them, but I don't have any transport, could there be a monthly vehicle to visit if needed to collect our bulky waste.</li> </ul>
Increase Awareness	5	0.7	<ul style="list-style-type: none"> <li>Morning re Facebook / social media interaction. Giving advice of good practices and bad practices.</li> </ul>
Greater enforcement for people misusing the system	4	0.5	<ul style="list-style-type: none"> <li>In Grangetown citizens misuse green bags so they should be fined.</li> </ul>
Misc.	44	5.8	<ul style="list-style-type: none"> <li>Leave it as changes and charges in the current climate will lead to suicides.</li> <li>Just make it easier.</li> </ul>
<b>Total Respondents</b>	<b>764</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*

Appendix Q - Are you aware of Terracycle initiatives, to recycle 'hard to recycle' items such as crisp packets, cleaning products, food pouches? If yes, do you use the service? If no, why not – Other

Theme	No.	%	Example Comments
Don't have the time / Insufficient Storage / Space to store and recycle numerous items	36	30.5	<ul style="list-style-type: none"> <li>I don't have time and not enough space to store items between drop-offs.</li> <li>It's too difficult to store and recycle different things.</li> <li>Too time consuming.</li> <li>Don't have room to store individual recycle waste. Not hygienic to store all the different containers etc.</li> <li>It's too much effort to store it all up to then take to the centre, we do not have the internal storage space.</li> </ul>
Location / Collection / Drop off point not convenient	18	15.3	<ul style="list-style-type: none"> <li>Difficult to drop off at times when open.</li> <li>I would have to drive (not very green) to access a collection point.</li> <li>Only once a week on a Saturday morning not at all convenient for me.</li> <li>Collection point keeps moving, timing is inconvenient.</li> </ul>
Accessibility Issues	14	11.9	<ul style="list-style-type: none"> <li>I'm disabled and can't drive so I can't go carry rubbish around with me.</li> <li>Difficult to access.</li> <li>I don't have a vehicle to get there.</li> </ul>
Poorly advertised / lack of information / find it confusing	13	11.0	<ul style="list-style-type: none"> <li>Lack of information about how to make proper eco-bricks plus lack of places to take them to.</li> <li>Poorly advertised services.</li> <li>Tried to find one but website was really confusing.</li> </ul>
Use service at local supermarket	9	7.6	<ul style="list-style-type: none"> <li>I recycle soft plastic at the Coop.</li> <li>Take soft plastics to the supermarket.</li> </ul>
Don't have the need	7	5.9	<ul style="list-style-type: none"> <li>I don't produce much of this waste.</li> </ul>

			<ul style="list-style-type: none"> <li>• Don't generate much.</li> </ul>
Unsure if initiative is still running	5	4.2	<ul style="list-style-type: none"> <li>• We used to before covid, but routine was interrupted when lockdowns hit.</li> </ul>
Not cost effective / quality of end product	5	4.2	<ul style="list-style-type: none"> <li>• Very expensive to do on a personal level.</li> </ul>
Council's Job	4	3.4	<ul style="list-style-type: none"> <li>• Buck passing by Council in a weak attempt to comply with Senedd's increasingly onerous diktats. There comes a point where these requirements become unreasonable. That point has been passed.</li> </ul>
Bin size	2	1.7	<ul style="list-style-type: none"> <li>• The local bins are very small and usually full.</li> </ul>
Misc.	10	8.5	<ul style="list-style-type: none"> <li>• They are still in a bag in my house waiting for me to do it!</li> <li>• It's a waste of time.</li> </ul>
<b>Total Respondents</b>	<b>118</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*



Appendix R - When you no longer have a use for a large household item, for example a dining table/sofa, how do you remove it from your house – Other

Theme	No.	%	Example Comments
Pay for a commercial registered company	21	25.0	<ul style="list-style-type: none"> <li>• Pay for removal by registered clearance company.</li> <li>• Book a commercial disposal as the lead times for Council collections mean I have to store the items for weeks/months before collection.</li> <li>• Use a private waste management company.</li> <li>• Employ a registered waste carrier.</li> <li>• Pay a private contractor.</li> </ul>
Offer to family / friends	14	16.7	<ul style="list-style-type: none"> <li>• Offer it to younger generation family members.</li> <li>• Always offer to family first.</li> <li>• Ask friends and family if they want the item.</li> </ul>
Leave outside for scrap metal dealers	9	10.7	<ul style="list-style-type: none"> <li>• If it is metal, I leave it in the forecourt and the Scrap Metal dealers often remove it.</li> <li>• Put it kerbside for ironmonger collection where possible.</li> <li>• Saw it up &amp; leave metal parts for scrap metal collectors.</li> </ul>
Freecycle	7	8.3	<ul style="list-style-type: none"> <li>• Offer on Freecycle and Olio.</li> <li>• Free via gumtree.</li> </ul>
Dismantle and put into black bin	7	8.3	<ul style="list-style-type: none"> <li>• If its wood I cut it up and put in black bin.</li> <li>• Cut it up and bin it.</li> </ul>
Concerns around Council Bulky Waste Collection service	7	8.3	<ul style="list-style-type: none"> <li>• This is an area that the Council could massively improve on - there just aren't enough facilities for disposal of these types of things. Incredibly hard to try and give away (charities are fussy, freecycle etc people just don't turn up!).</li> <li>• Paid a national organisation to remove it as the council service was impossible to book in a timely manner.</li> </ul>
Skip	6	7.1	<ul style="list-style-type: none"> <li>• Book a skip.</li> </ul>

			<ul style="list-style-type: none"> <li>• Paid for a skip as the waiting list was months and couldn't store it in the house so got wet and you wouldn't take it anyway.</li> </ul>
As vulnerable / cost conscious limited options for me	4	4.8	<ul style="list-style-type: none"> <li>• I have had a wooden table in my front garden for almost a year now as I can't lift it being disabled and can't afford to get it collected.</li> </ul>
Book Bulky Waste Collection from Council	3	3.6	<ul style="list-style-type: none"> <li>• It depends on whether it still works or not. Last couple of times I booked bulky waste collections I put it out in the morning as instructed, but the scrappies beat you to it, and I just got a missed collection notice from your guys. So lost recycling tonnage and wasted journey/money.</li> </ul>
Take to Recycling Centre	3	3.6	<ul style="list-style-type: none"> <li>• If I have to, cut it up and take it to the recycling centre.</li> </ul>
Burn it	2	2.4	<ul style="list-style-type: none"> <li>• Chop some items up for firewood.</li> </ul>
Misc.	7	8.3	<ul style="list-style-type: none"> <li>• Try to live with it.</li> <li>• Depends on what it is made of.</li> </ul>
<b>Total Respondents</b>	<b>84</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*

## Appendix S - How do you think the Council could reduce, or support initiatives that reduce single use plastic across the city – Other

Theme	No.	%	Example Comment
Tax on plastic / Ban sale/ restrict use of single plastic	218	22.9	<ul style="list-style-type: none"> <li>• Persuade businesses not to use single use plastic if at all possible.</li> <li>• Force companies to stop using so much single use plastic.</li> <li>• Ban the sale of items sold in single use plastic containers.</li> <li>• Plastic tax.</li> <li>• Enforce shops and manufacturing to use recyclable materials in the first place.</li> </ul>
<b>Support Initiatives</b> - Incentivise / Lower taxes for environmentally friendly businesses	205	21.6	<ul style="list-style-type: none"> <li>• By lowering business rates for appropriate businesses.</li> <li>• Assist independent zero waste shops.</li> <li>• Tax relief for businesses that take part.</li> <li>• Reduce business rates for retailers who provide re-fill in their shops.</li> <li>• Subsidies for shops that provide package free produce e.g. rice, shampoo etc to enable them to make their products cost effective in these difficult financial conditions.</li> </ul>
Greater Legislation / Fines / partnership with Businesses / Manufacturers	192	20.2	<ul style="list-style-type: none"> <li>• Put pressure on supermarkets who use unnecessary plastic packaging.</li> <li>• Pressure companies to stop producing them.</li> <li>• Pressure business to drive change.</li> <li>• Work with supermarkets and takeaway business to reduce single use plastics. Better support businesses that don't use or sell plastic items or packaging.</li> <li>• Legislate against the manufacturers!</li> </ul>
More Education / Awareness / Advice / Support	190	20.0	<ul style="list-style-type: none"> <li>• Needs more advice for people.</li> <li>• Education &amp; information.</li> <li>• Increased awareness of any schemes.</li> <li>• Targeting primary and secondary schools for education and alternatives.</li> <li>• I don't know the difference between single use plastic and other types. How does one</li> </ul>

			find out? Should it not be printed on the green plastic sacks?
Foster reuse / refill culture	153	16.1	<ul style="list-style-type: none"> <li>• Provide reusable containers for lower income households, to take to re-fill stations.</li> <li>• Hygienic filling points, and perhaps Council logo aluminium bottles for re-filling to pupils etc.</li> <li>• More availability of refilling stations. Free/ subsidised containers for low-income houses.</li> <li>• Recyclable/reusable recycling containers, including public bins.</li> </ul>
Greater focus on takeaway establishments / Cafes / Bars	78	8.2	<ul style="list-style-type: none"> <li>• Charge takeaways that don't use recyclable stuff.</li> <li>• Make Cardiff "plastic free" work with businesses to support them to move to plastic free e.g. hotels, takeaways, bars &amp; pubs etc.</li> </ul>
Install Water Fountains	62	6.5	<ul style="list-style-type: none"> <li>• Increase areas where free water is available.</li> <li>• Water stations in public places.</li> </ul>
Use Compostable or recyclable bags / packaging	59	6.2	<ul style="list-style-type: none"> <li>• The green bags are much more convenient to use than the hessian sacks, it encourages house to participate in recycling. Perhaps the council could Make the single use plastic bags biodegradable and environmentally friendly.</li> <li>• Change the green plastic bags to recyclable one use bags, like the ones that the Which magazine gets delivered in.</li> </ul>
Council to lead by example	58	6.1	<ul style="list-style-type: none"> <li>• Aim to not use single use plastics across all Council activities and premises e.g. crisps / sandwich wrappers/ water bottles.</li> <li>• Stop any council run event using single use plastic.</li> </ul>
Don't know	54	5.7	<ul style="list-style-type: none"> <li>• I really don't know. It's one thing to improve recycling opportunities but not sure how you</li> </ul>

			<p>would influence consumers to change their habits in terms of what they buy.</p> <ul style="list-style-type: none"> <li>• Not sure what the council could do beyond what is already done.</li> </ul>
Incentives	53	5.6	<ul style="list-style-type: none"> <li>• Encourage by reward, e.g. vouchers to reduce resident parking fees or council tax rather than fining non-compliance.</li> <li>• Incentives such as a cheaper product if bringing your own container.</li> </ul>
More resources for better recycling	52	5.5	<ul style="list-style-type: none"> <li>• Bring back local skips.</li> <li>• Provide collection bins in local shops/supermarkets.</li> </ul>
Needs a national approach	41	4.3	<ul style="list-style-type: none"> <li>• See my earlier response. This needs a UK wide approach and local authorities cannot realistically move the dial without central government mandating changes from manufacturers.</li> </ul>
Bins not bags	23	2.4	<ul style="list-style-type: none"> <li>• Have a wheelie bin for recycling, the green bags are too flimsy and break easily.</li> </ul>
Greater provision on match days / events	17	1.8	<ul style="list-style-type: none"> <li>• Joined up approach with local businesses. E.g. match days and large events that see large amounts of single use plastic cups throughout town. The council could look with businesses and provide reusable cups that need a deposit. They can then be returned to a bar/premises for their next drink or their deposit back. Or kept by the customer if they wish to keep it. There will still be some waste, but it will reduce the amount.</li> </ul>
Council to collect all plastic	13	1.4	<ul style="list-style-type: none"> <li>• Provide collection of all plastic.</li> </ul>
Cost, time and money	10	1.1	<ul style="list-style-type: none"> <li>• Support but not a cost of taxpayer.</li> </ul>

Hygiene concerns	7	0.7	<ul style="list-style-type: none"> <li>• Don't know, but re-fill is not the answer. Dirty grubby people touching things that you will then use your stuff to refill. Disgusting thought.</li> </ul>
More important things to worry about	6	0.6	<ul style="list-style-type: none"> <li>• Should concentrate on other important things like state of roads and affordable housing.</li> </ul>
Look at initiatives in other countries	4	0.4	<ul style="list-style-type: none"> <li>• Look at how Amsterdam run by local council, plant pine trees in the inner city, including lanes giving people sense of well-being as a result behaviour would change gradually.</li> </ul>
Misc.	76	8.0	<ul style="list-style-type: none"> <li>• I am not convinced it is a viable option for public consumption at the present time.</li> <li>• Ban wearing of face masks - they are everywhere.</li> </ul>
<b>Total Respondents</b>	<b>950</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*

## Appendix T - Do you participate in any of the following, which aim to prevent waste – Other

Theme	No.	%	Example Comments
Repair / repurpose Items / upcycle	31	23.5	<ul style="list-style-type: none"> <li>• Repair and reuse where possible.</li> <li>• I repair small electrical items (I am qualified to do this) Encourage free repair locations say once a month at Hubs. I would volunteer.</li> <li>• Repair shoes, clothes etc.</li> <li>• Repair if possible all domestic items specifically mechanical &amp; electrical.</li> </ul>
<b>Use no packaging options</b> - Loose fruit & Veg / Soap / ethical wrapping / reusable shopping bags	26	19.7	<ul style="list-style-type: none"> <li>• Chose no-packaging options e.g. buy loose fruit &amp; veg at a market/greengrocer instead of plastic-wrapped/bagged supermarket option.</li> <li>• Only use soap instead of shower gel, bottle shampoo etc.</li> <li>• Take Tupperware to Morrisons for meat/fish etc. leave packaging at supermarket where no option.</li> <li>• Not buy pre-packaged food.</li> </ul>
Social media sites - Freecycle / give away unwanted items	19	14.4	<ul style="list-style-type: none"> <li>• Social media platforms for recycling within the community.</li> <li>• Use Too Good to Go app to help reduce food waste.</li> <li>• Giving away items I no longer need rather than sending to landfill.</li> </ul>
Charity shops / 2nd hand goods	18	13.6	<ul style="list-style-type: none"> <li>• Donate all clothes, toys and books in good condition to charity rather than putting into black bin.</li> <li>• Shop in charity shops for books and CD'S.</li> <li>• Take unwanted items to charity shops.</li> </ul>
Use Repair Shops / cafes	15	11.4	<ul style="list-style-type: none"> <li>• We use Repair Cafe facilities in Canton and Fairwater.</li> <li>• Use of repair shop Wales.</li> <li>• I volunteer at a monthly Repair Cafe where we try to repair items rather than see them thrown away.</li> </ul>

No Unnecessary Buying / Buy based on need not want	13	9.8	<ul style="list-style-type: none"> <li>• I don't pander to the pressure to continually buy things I don't really need.</li> <li>• Repair old equipment and consume less generally - a simpler way of life.</li> </ul>
Compost / Wormery / Allotment / Home growing	10	7.6	<ul style="list-style-type: none"> <li>• Grow our own in allotment and compost garden waste there. We need more allotment spaces.</li> <li>• Wormery.</li> </ul>
Reusable / Washable nappies / sanitary products	9	6.8	<ul style="list-style-type: none"> <li>• Reusable sanitary items bit like nappies but for menstruating females.</li> <li>• Reusable sanitary protection.</li> </ul>
Recycle single use plastic products	6	4.5	<ul style="list-style-type: none"> <li>• Wash and re-use 'single-use' plastic bags, bottles and food packaging, but 2nd hand clothes and repair when broken, use bees wrap food wraps.</li> </ul>
More action needed for manufacturers / big business	6	4.5	<ul style="list-style-type: none"> <li>• I don't understand why you don't realise that I personally don't produce a lot of waste. It's on all the stuff you buy. Make manufacturers more responsible for using less protective packaging on their PR.</li> </ul>
Would like to see more refill / zero waste stores	3	2.3	<ul style="list-style-type: none"> <li>• Would like more on refill and zero waste shops. Should be more publicity.</li> </ul>
Misc.	22	16.7	<ul style="list-style-type: none"> <li>• Drive a hybrid car.</li> <li>• Follow my own education &amp; not yours.</li> <li>• Educate others, lobby school to improve practice.</li> </ul>
<b>Total Respondents</b>	<b>132</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*



Appendix U - Would you like to see the Council doing more to promote waste minimisation initiatives? If yes, what options do you think we should explore – Other

Theme	No.	%	Example Comments
Make more resources available - repair shops / libraries of items etc.	37	27.6	<ul style="list-style-type: none"> <li>• Help support repair cafes and help extend "libraries of things" ideally through the hubs.</li> <li>• Libraries of things (e.g. household tools, toy libraries, baking cake moulds/equipment, baby equipment (highchairs etc), instruments).</li> <li>• Expand the number of re-use centres / shops</li> <li>• Send out information on places to get small electricals repaired, e.g. mobile phones, printers, etc. Encourage a repair culture.</li> <li>• Consider working in partnership with the Repair Cafe network to increase usage.</li> </ul>
Better partnership / enforcement -in particular big business / manufacturers	32	23.9	<ul style="list-style-type: none"> <li>• Massive fines for businesses or manufacturers making the waste to begin with, why can't we just buy things with minimal packaging, the amount of cardboard I go through alone each week from food packing alone is beyond, just waste, the info could be digitally printed onto clear 100% recyclable sourced plastic/paper packing.</li> <li>• Legislate to force supermarkets to only supply recyclable packaging.</li> <li>• Work with businesses to support innovation to reduce single use containers for food delivery.</li> <li>• Get businesses to reduce their plastic waste and force them to take back the plastic waste they force their customers to take.</li> </ul>
Foster a reuse culture	28	20.9	<ul style="list-style-type: none"> <li>• Incentives provided to households for innovative reusing and repurposing ideas.</li> <li>• Washable incontinence products where feasible. Promote wool over nylon and other plastic fibres.</li> <li>• Reusable recycling containers must be washable.</li> <li>• Donate refill items.</li> </ul>
Education is key	23	17.2	

			<ul style="list-style-type: none"> <li>• Until we re-educate everyone that the throw away and replace society is not good for the environment, we are facing an uphill struggle to minimise waste.</li> <li>• More education. I've never ever heard of "real nappies", or "refill locations" or what they actually refill.</li> <li>• Work with universities and colleges to educate students.</li> </ul>
Partner with existing initiatives / 3rd sector	12	9.0	<ul style="list-style-type: none"> <li>• Partner with existing initiatives like Benthg Cymru.</li> <li>• Use third sector groups to repair or recycle e.g. Men's heds, Repair Cafes, tools with a mission and similar initiatives. Try to make funds are available to support them unconditionally.</li> </ul>
Have a community approach	12	9.0	<ul style="list-style-type: none"> <li>• More support for community 'borrowing'.</li> <li>• I would like to see support for community composting. For instance my street could replace on parking space with a communal composting bay.</li> </ul>
Home composting initiatives	11	8.2	<ul style="list-style-type: none"> <li>• Provide or sell compost bins to households.</li> <li>• Availability of compost from green bins to householders to use in their gardens.</li> </ul>
Tweak the system to accommodate different waste streams	8	6.0	<ul style="list-style-type: none"> <li>• Have the last Friday of every month be furniture recycling day as in some German states. People put out the furniture they don't want on a Friday, anyone can come and pick it up on the Friday. On Saturday if it's still there, the council takes it to Charities that resell it.</li> <li>• Collect recyclable materials such as plastic bags, film lids, tetra oaks etc as have to collect these separately and take to Sainsburys.</li> </ul>

Minimise food waste - with cooking tips - leftover recipes	7	5.2	<ul style="list-style-type: none"> <li>• Teach people to cook and use leftovers.</li> <li>• Encourage more businesses to donate excess food on Olio or food charities (Tesco, Starbucks, chains with expired food).</li> </ul>
Simplicity is key	7	5.2	<ul style="list-style-type: none"> <li>• Make it much easier for people to dispose of things well where it's possible.</li> <li>• Collect everything from residents and reduce the amount that has to go into black bags and landfill.</li> </ul>
Consider vulnerable people	2	1.5	<ul style="list-style-type: none"> <li>• Encouragement is always good, I and remembering that even with education and encouragement some people will simply not understand or be able to comply. Due to issues like mental health illnesses or special needs like autism.</li> </ul>
Misc.	23	17.2	<ul style="list-style-type: none"> <li>• I have answered to yes above but it where there are incentives, they should be for low-income families.</li> <li>• Use products only sourced/made in Wales/UK.</li> <li>• Don't offer incentives when not everybody can benefit.</li> </ul>
<b>Total Respondents</b>	<b>134</b>	<b>-</b>	

*N.B. Percentages do not total 100% as respondents' comments could fall into more than one theme*

Mae'r dudalen hon yn wag yn fwriadol



# Separate Recycling Pilot

Survey Results  
March 2022



Gweithio dros Gaerdydd, gweithio gyda'n gilydd  
Working for Cardiff, working together



#gweithiogydangilydd  
#workingtogether

Tudalen 423





#gweithiogydangilydd  
#workingtogether

Tudalen 424



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### Background

We need to improve our recycling rate. Cardiff currently recycles 58% of its waste, and while this is a strong performance for a core city, we are the lowest performing council in Wales. We should be recycling a minimum of 64%, and Welsh Government has asked us to make immediate improvements.

The Council has recently undertaken a separate recycling collection pilot for 4,000 homes across Cardiff in an effort to improve the quality of material we collect for recycling. We are also taking action against the 24 million single use plastic bags we issue every year.

The separate recycling pilot asked residents to split their dry recyclable material into 3 separate containers. A red sack for containers/packaging, a blue sack for fibres (paper and cardboard) and a blue caddy for glass bottles and jars.

The views gathered in the survey will help us to understand how you have found using the new service.

### Methodology

Households taking part in the pilot were sent a letter with details of the survey and asked to give their views and experiences of the scheme.

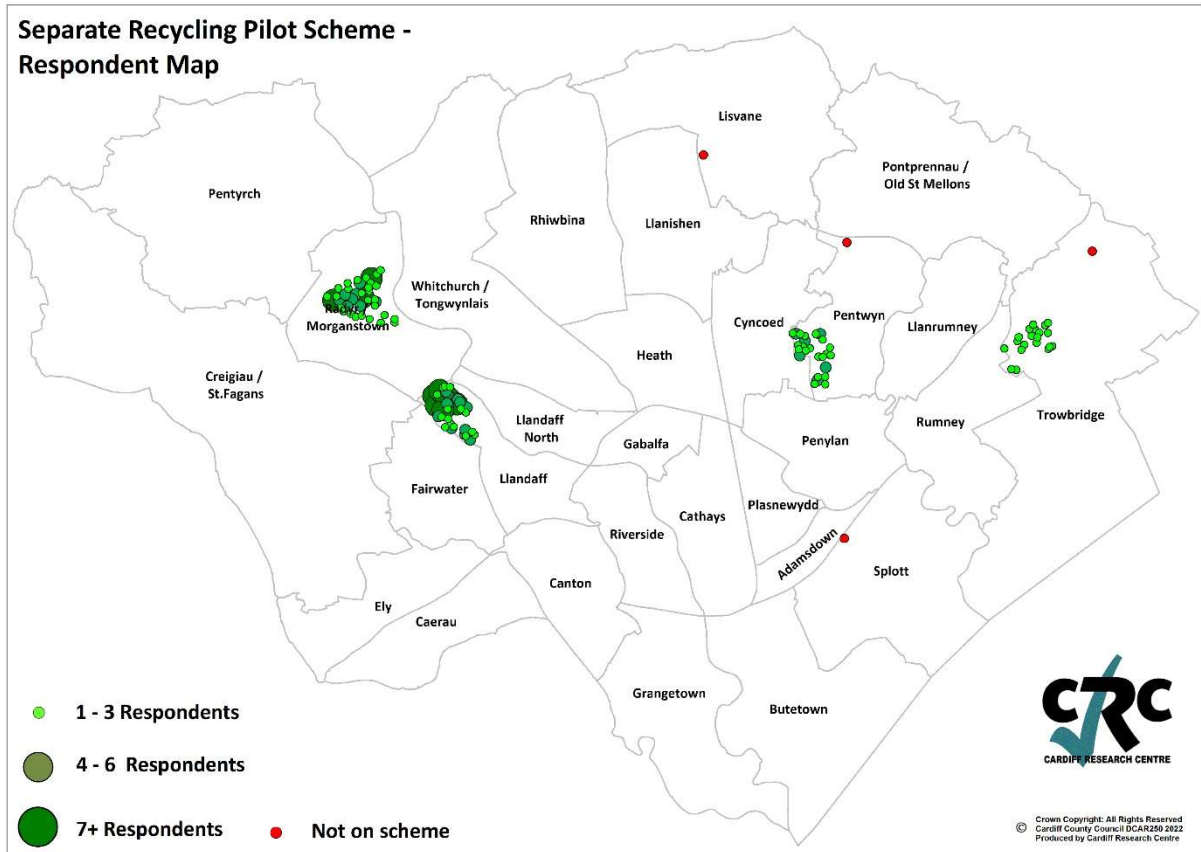
Links to the survey were also made available on the Have Your Say page of the Council's website.

### Results

A total of 363 responses were received after data validation removed blank and duplicated responses. This number is too small to provide statistically robust data for sub-groups, so this provides the analysis of results overall.

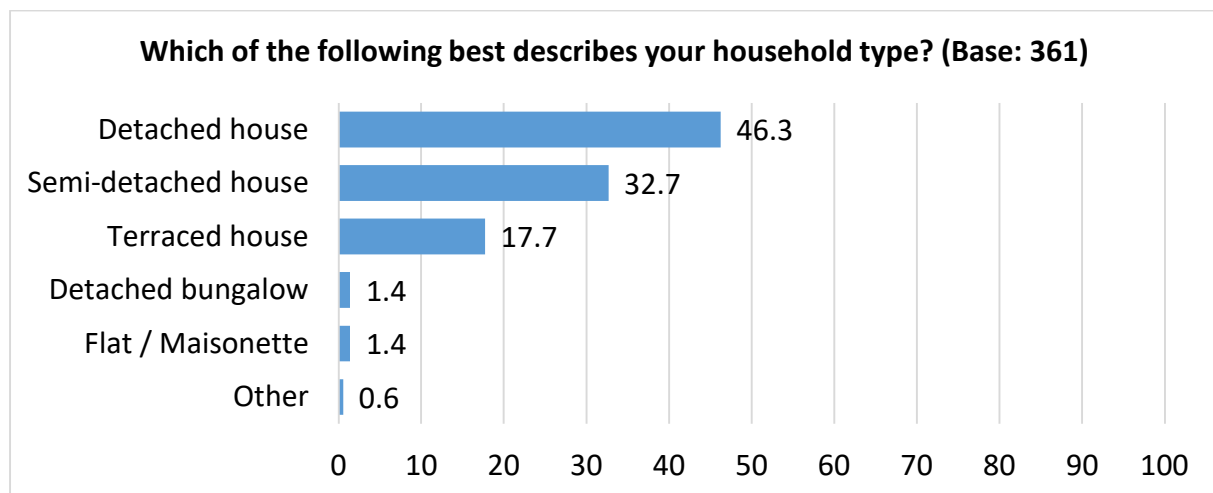
Please provide your postcode to allow us to more accurately pinpoint residents' views and needs by trial area:

Of those taking part in the survey, 332 provided their full postcode, which are shown in the map below:



Which of the following best describes your household type?

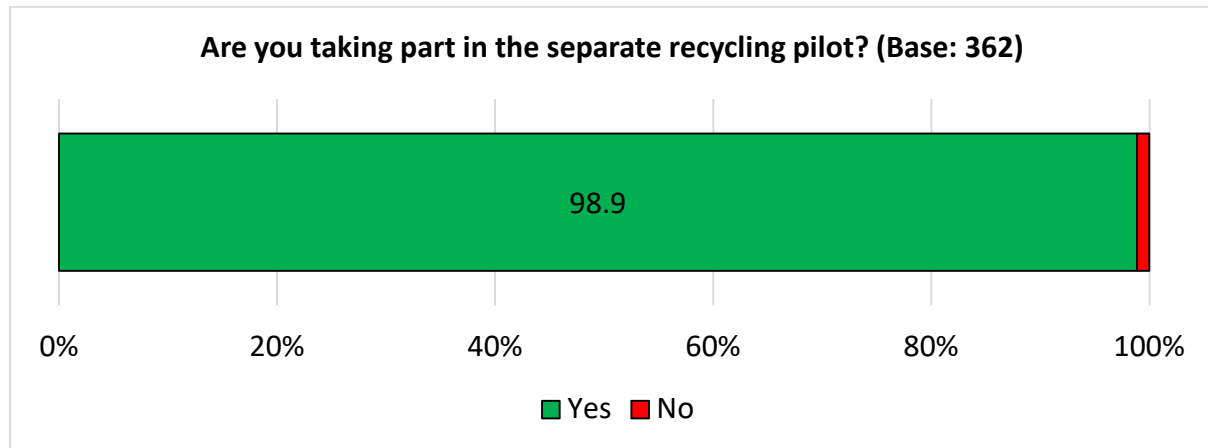
Almost half (46.3%) of respondents lived in a detached house, with around a third (32.7%) in a semi-detached house, and just under a fifth (17.7%) in a terraced house.



## Separate Recycling Pilot

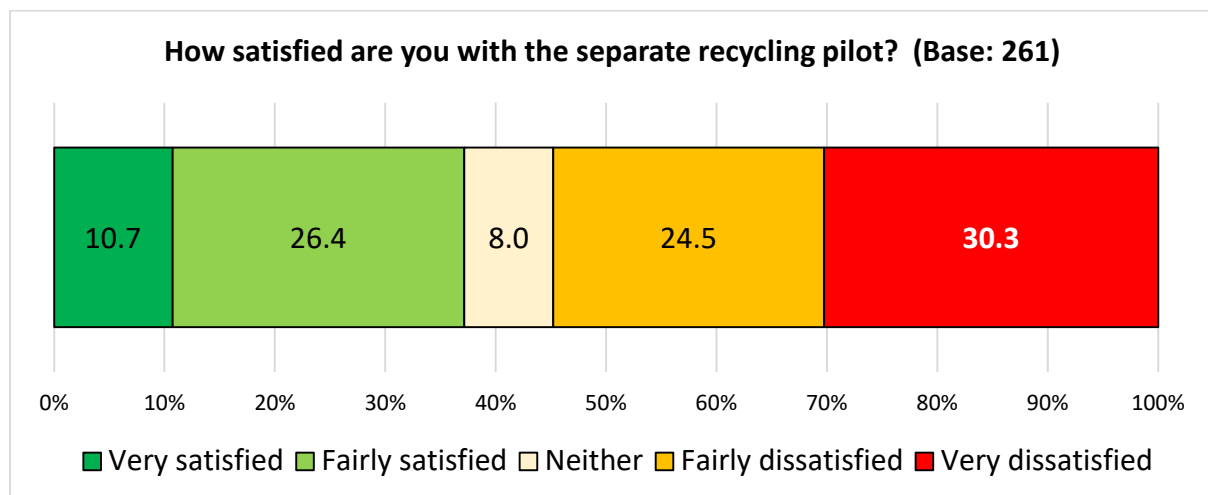
### Are you taking part in the separate recycling pilot?

Just four respondents to the survey had not taken part in the separate recycling pilot scheme. Those answering 'No' to this question were not asked questions about the pilot scheme.



### How satisfied are you with the separate recycling pilot?

Overall, 37.2% of respondents described themselves as satisfied with the separate recycling pilot, compared with 54.8% who felt dissatisfied. Three in ten respondents (30.3%) felt 'very dissatisfied'.



### If dissatisfied, please tell us why:

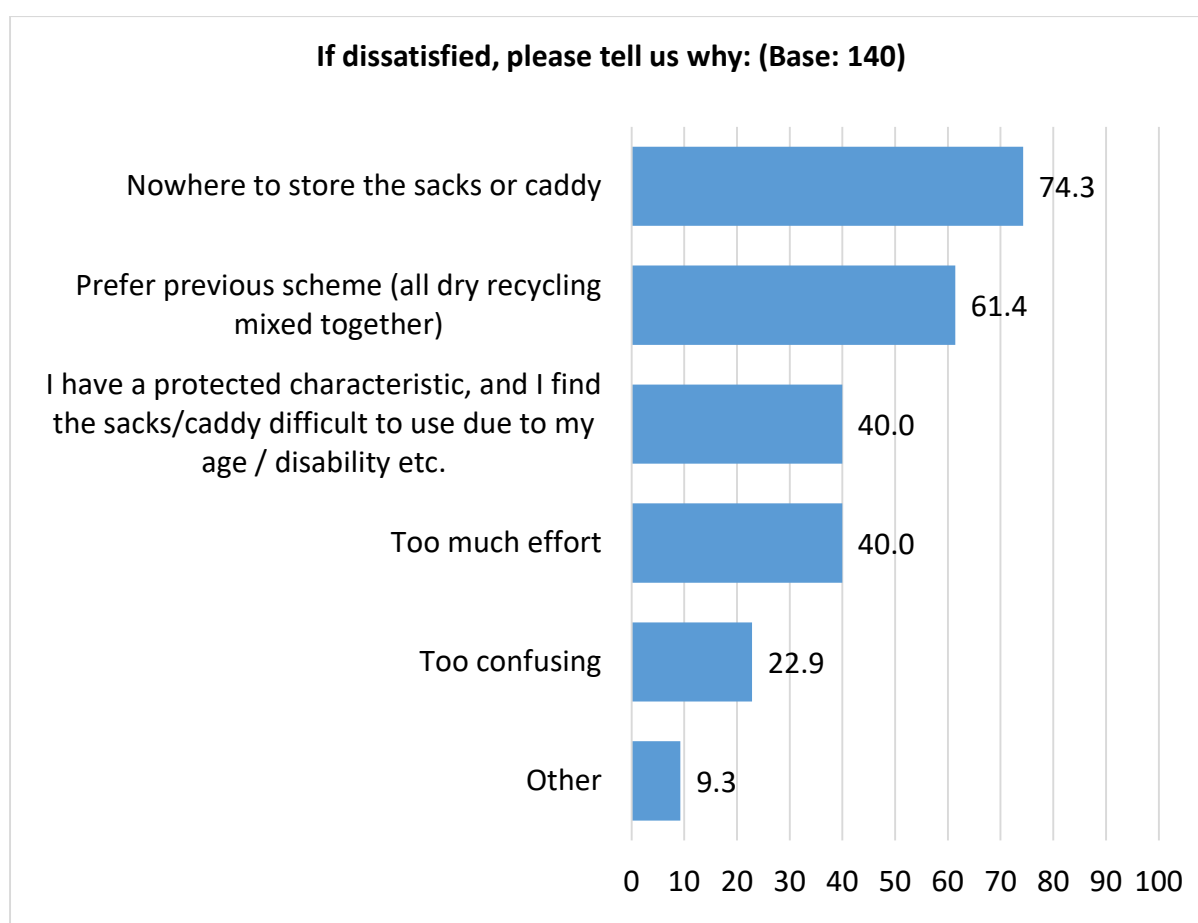
Respondents describing themselves as dissatisfied were asked to explain why.

Storage was the biggest issue, with three-quarters (74.3%) of respondents reporting they had nowhere to store the sacks or caddy provided for the pilot.

Three-fifths (61.4%) of respondents stated they preferred the previous scheme where all dry recycling was mixed together in a green bag.

Two-fifths (40.0%) of respondents found it difficult to use the sacks or caddy due to a protected characteristic such as age or having a disability. The same number (40.0%) found the separate recycling 'too much effort'.

Just under a quarter (22.9%) found the pilot scheme 'too confusing'.



Those answering 'Other' were asked to give further details – 53 comments were received, and grouped into the following themes:

Theme	No	%	Example Comment
<b>Concerns around sack quality / design</b>	35	66.0	– <i>The recycling bags are poor quality, the weight used is insufficient to stop getting blown down the road and the Velcro is difficult to use</i>

			<ul style="list-style-type: none"> <li>– The bags blow about even in very light wind and then scatter litter</li> <li>– The sacks don't close properly exposing the contents to rain. Also, flimsy and always have some paper and plastic items left inside after collection.</li> <li>– Unsuitable, unfit for purpose plastic sacks</li> </ul>
<b>Health &amp; safety issues</b>	28	52.8	<ul style="list-style-type: none"> <li>– The bags get put out and dogs urinate on them, which is disgusting. In Storm Eunice, traveling around was a plethora of abandoned bags and boxes.</li> <li>– Once emptied they blow onto the road causing a hazard to pedestrians and traffic alike. If anyone had done any sort of risk analysis on them, they would have realised that they are a health and safety issue.</li> <li>– They blow around everywhere in bad weather, with everything spilling out, and smell of cat's urine when you bring them in.</li> </ul>
<b>Lack of specialist waste vehicles</b>	12	22.6	<ul style="list-style-type: none"> <li>– It is utterly stupid and ridiculous that the council makes the householder go through the separation of various dry waste products and then see the incredible sight of the bin-men dumping it all in the same truck!!</li> <li>– It has been most disheartening after the effort we have made to segregate our recycling to see the contents of both red and blue sacks thrown together in the collection vehicle. It makes me feel I am wasting my time and wonder if I will bother in future.</li> </ul>
<b>Too awkward to use/store</b>	7	13.2	<ul style="list-style-type: none"> <li>– My mother is 96, lives on her own and is also part of this trial. She has always recycled but finds this separation beyond her.</li> <li>– Too many bags/bins to carry down our long driveway - we now have six recycling bins with nowhere to put them in the house/garden - where are we supposed to store six bins? We are able to carry all six of the recycling bins now, but what about when we get older?</li> </ul>
<b>Other</b>	4	7.5	<ul style="list-style-type: none"> <li>– More waste is going in black bin as not deemed clean for the red bag. This is meaning users are either dropping the old green bags in areas that are not partaking in scheme or alternatively putting black bag waste in street bins!!! Your comments that the incorrect material recycling figures have improved will not correlate with the</li> </ul>

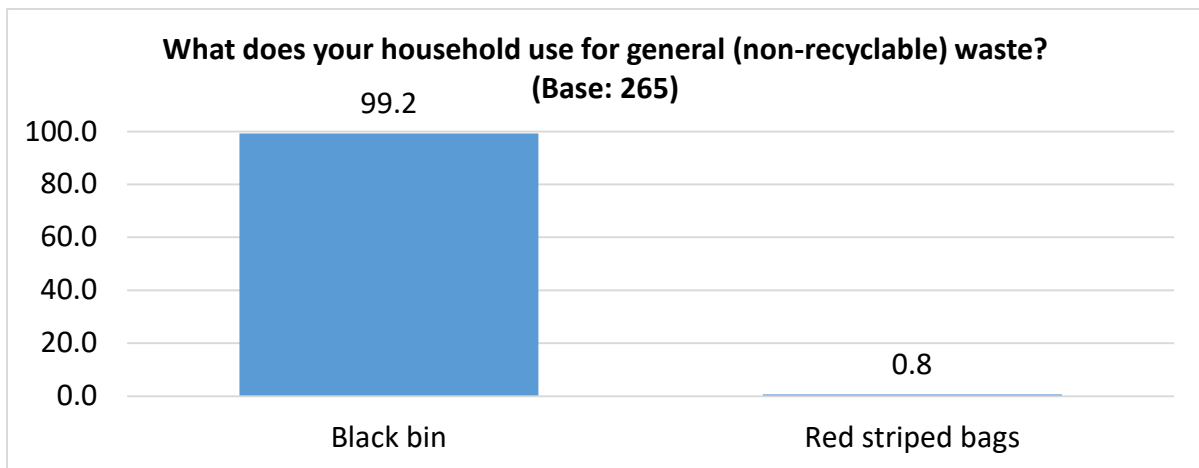
*increase in rubbish / pressure put on local street bins in the area.*

If you are not taking part in the separate recycling scheme, how are you disposing of these items?

Respondents not taking part in the separate recycling pilot were asked how they disposed of the items that were covered by the scheme. Three of the four responses received indicated these items were put in the green recycling bags for the co-mingled recycling collection; one respondent put them in their black bin or red striped bag.

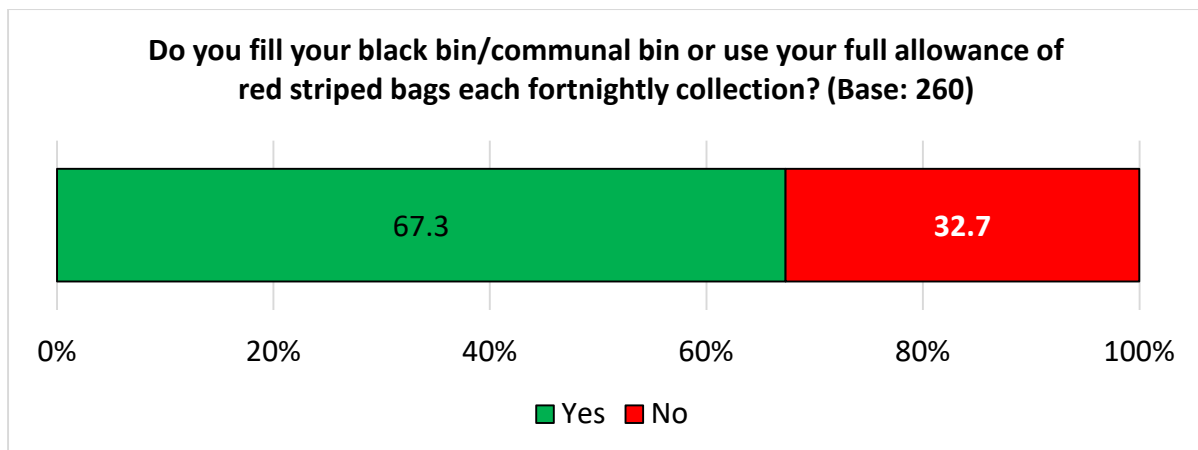
What does your household use for general (non-recyclable) waste?

Almost all respondents to this question (99.2%) used a black bin for their general waste, compared with just 0.8% who use red striped bags.



Do you fill your black bin/communal bin or use your full allowance of red striped bags each fortnightly collection?

Two-thirds of respondents (67.3%) stated they filled their bin or used their full allowance of red striped bags every fortnightly collection.

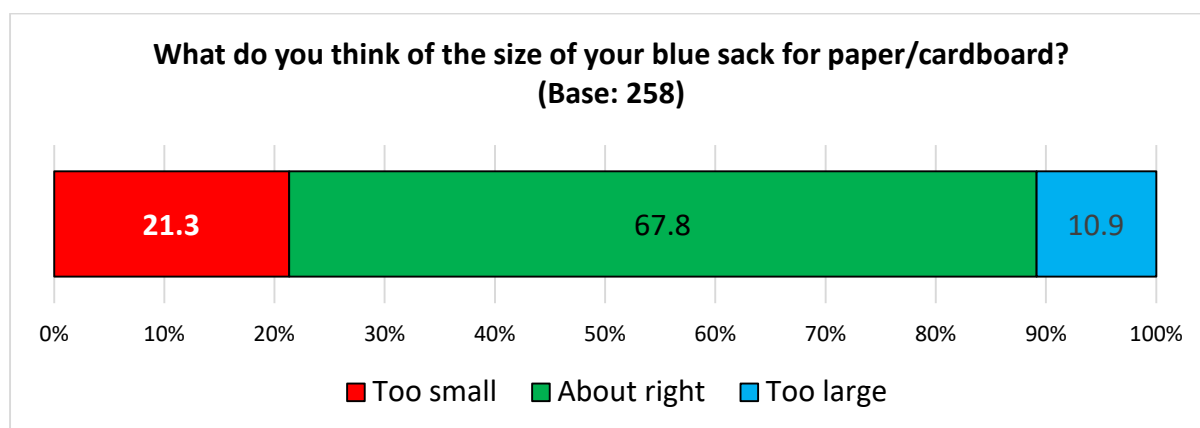


Paper and cardboard is collected in a blue, re-usable sack. The sack is 90L. A standard green recycling bag is 60L in comparison. The sacks are weighted at 500g, which is the standard weight used across Wales. The sacks also have a lid, which is secured by Velcro.

### What do you think of the size of your blue sack for paper/cardboard?

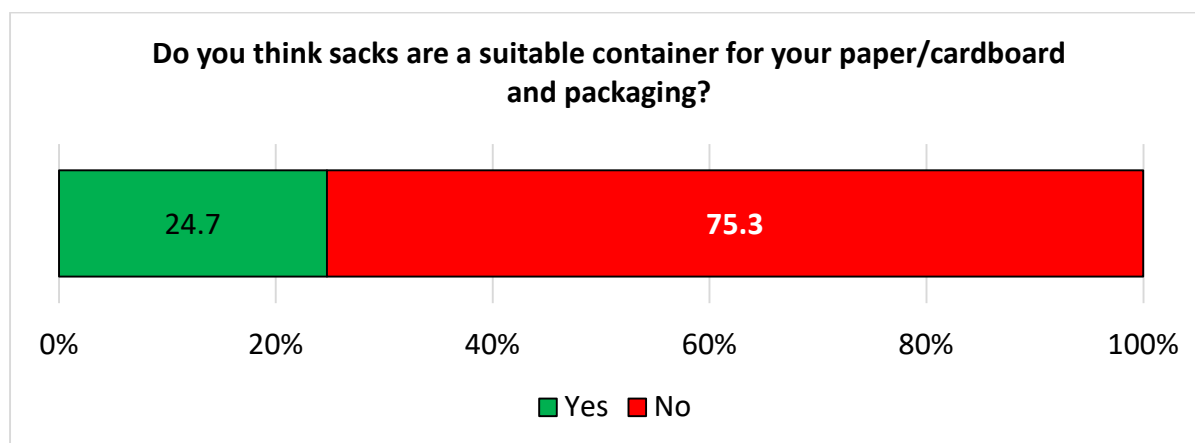
Typically, respondents were happy with the size of the blue sack used to recycle paper and cardboard, with 67.8% describing this as 'about right'.

One in ten (10.9%) felt the sacks were too large, one in five (21.3%) felt they were too small.



### Do you think sacks are a suitable container for your paper/cardboard and packaging?

Just a quarter of respondents (24.7%) felt the sacks were a suitable container for paper and cardboard packaging.



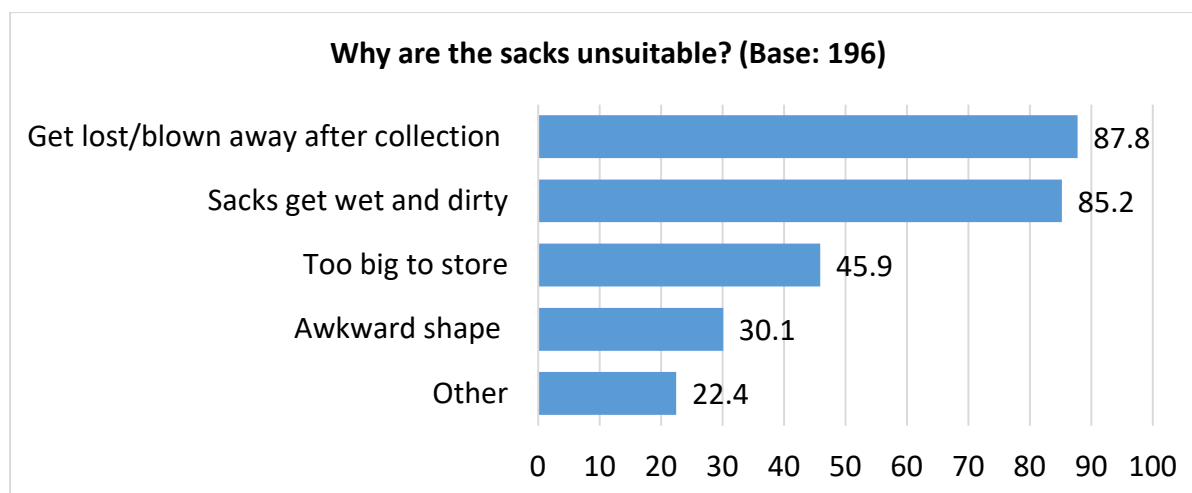
Those who didn't think the sacks were suitable were asked to explain why.



If no, why not?

More than four-fifths of respondents reported that the sacks get lost or blown away after the recycling has been collected (87.8%) and that the sacks get wet and dirty (85.2%).

Just under half (45.9%) found the sacks were ‘too big to store’ and three in ten (30.1%) felt they were an ‘awkward shape’.



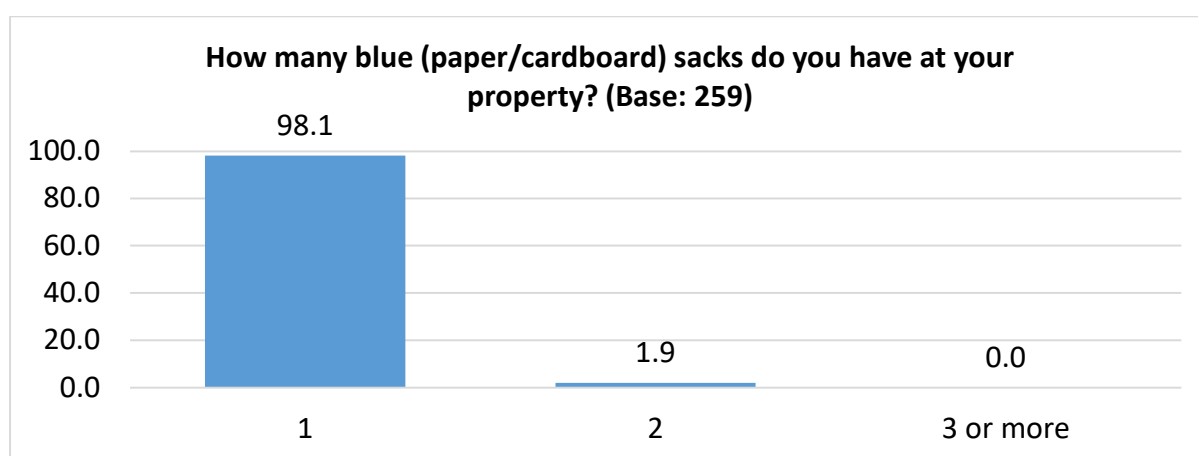
Those answering ‘Other’ were asked to give further details – 41 responses were received, and grouped into the following themes:

Theme	No	%	Example Comment
<b>Concerns around sack quality / design</b>	28	68.3	<ul style="list-style-type: none"> <li>– <i>Shredded paper came out of the top in high winds and blew around. Container was quite heavy to lift when full</i></li> <li>– <i>The sacks are not waterproof so cannot be stored outside. The graphic showing what is not allowed is not clear - why not have only the paper pictures on the sack or cross out the unwanted materials with a much heavier line. Also, the sack is not marked with house number so difficult to retrieve correctly when the bags have blown around the street</i></li> <li>– <i>If it's raining the contents get wet as there is a gap at the sides of the handles.</i></li> </ul>
<b>Bags cause obstructions / Health &amp; safety issues</b>	14	34.1	<ul style="list-style-type: none"> <li>– <i>Once open wind takes it into roads and gardens. Very, very dangerous having to avoid them. We have had increase of contents in road and magpies, crows and seagulls making most of it</i></li> <li>– <i>Get dumped in the middle of the courtyard causing an obstruction.</i></li> <li>– <i>sharp materials can cause cuts to hands</i></li> </ul>

<b>Storage Issues</b>	7	17.1	– Where are people supposed to store them, particularly when they are wet? – we have now garbage blown all over the place because people do have nowhere to store these sacks
<b>Heavy / Awkward</b>	4	9.8	– Too unwieldy for me as a disabled person to handle. – Surprisingly heavy when full
<b>Other</b>	2	4.9	– Not suitable in any way, shape or form.

How many blue (paper/cardboard) sacks do you have at your property?

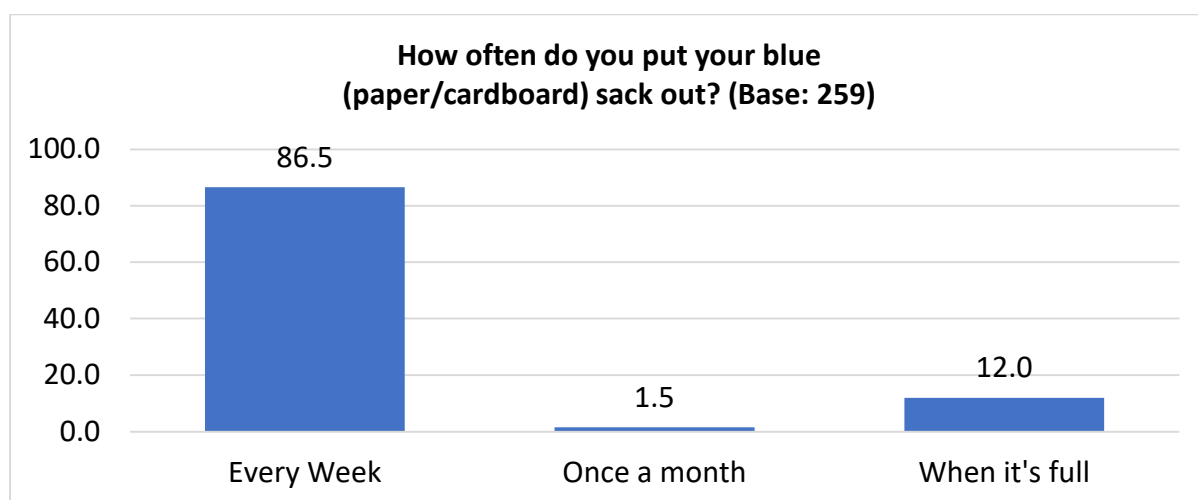
Almost all respondents (98.1%) had one blue sack; no-one had three or more.



How often do you put your blue (paper/cardboard) sack out?

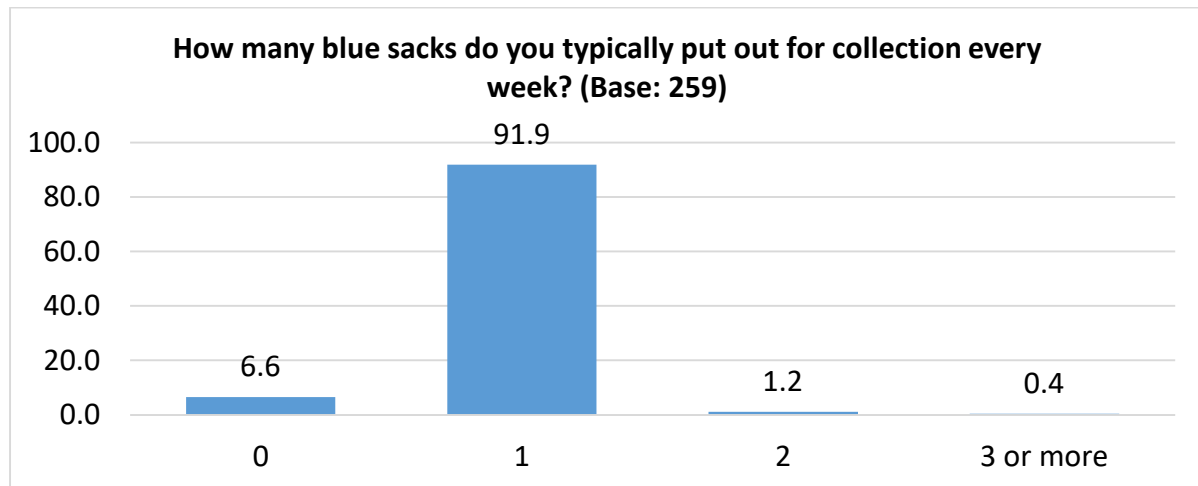
Around seven out of eight respondents (86.5%) put their blue sack for paper and cardboard out for collection every week, one in eight (12.0%) waited until the bag was full.

Just 1.5% of respondents put their paper/cardboard sack out for collection once a month.



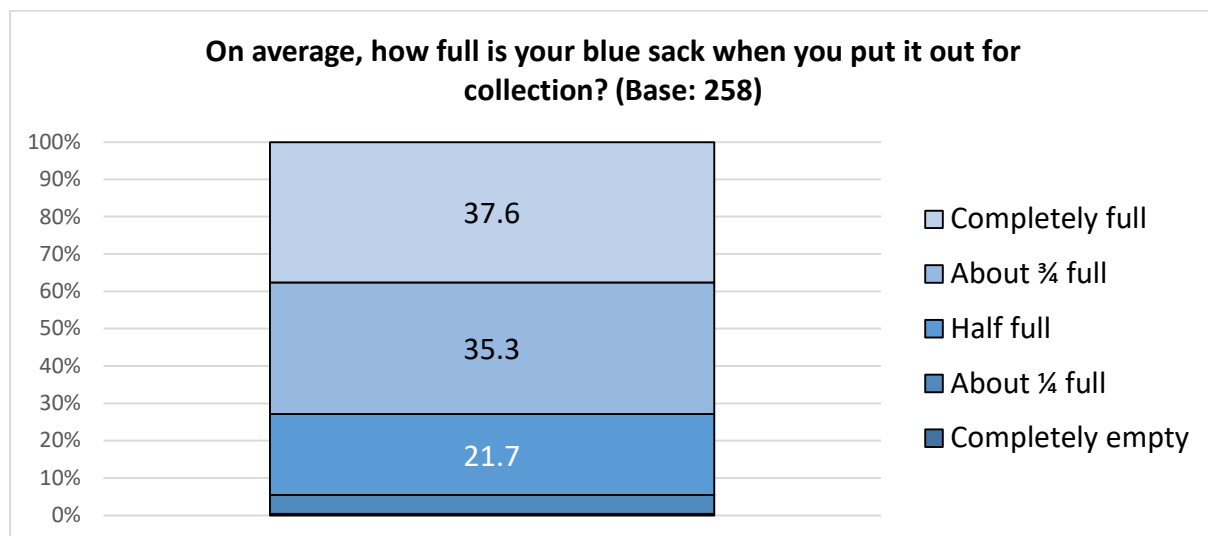
How many blue sacks do you typically put out for collection every week?

Nine in ten respondents (91.9%) typically put one blue sack out for collection every week, broadly reflecting the proportion reporting their household had been given one blue sack.



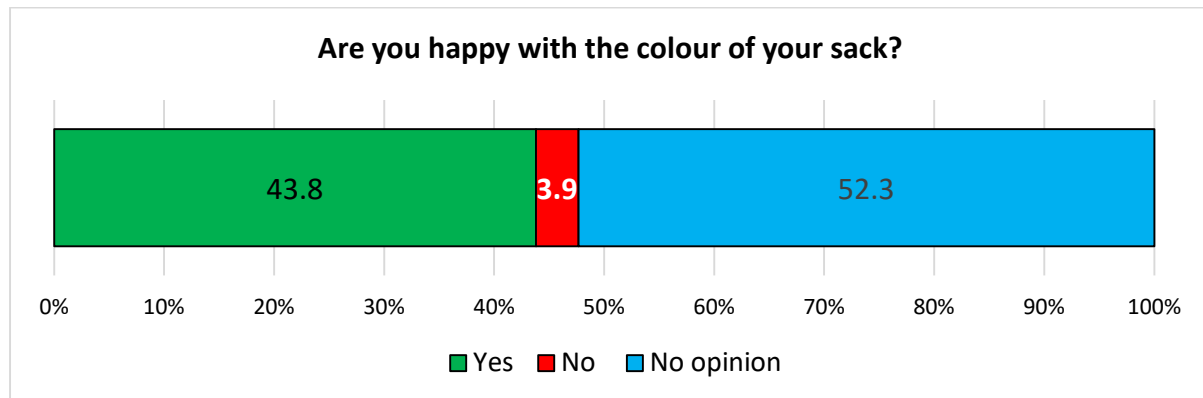
On average, how full is your blue sack when you put it out for collection?

Almost all respondents (94.6%) reported that their blue sack was at least half full when put out for collection, with more than a third (37.6%) stating that it was typically completely full.



### Are you happy with the colour of your sack?

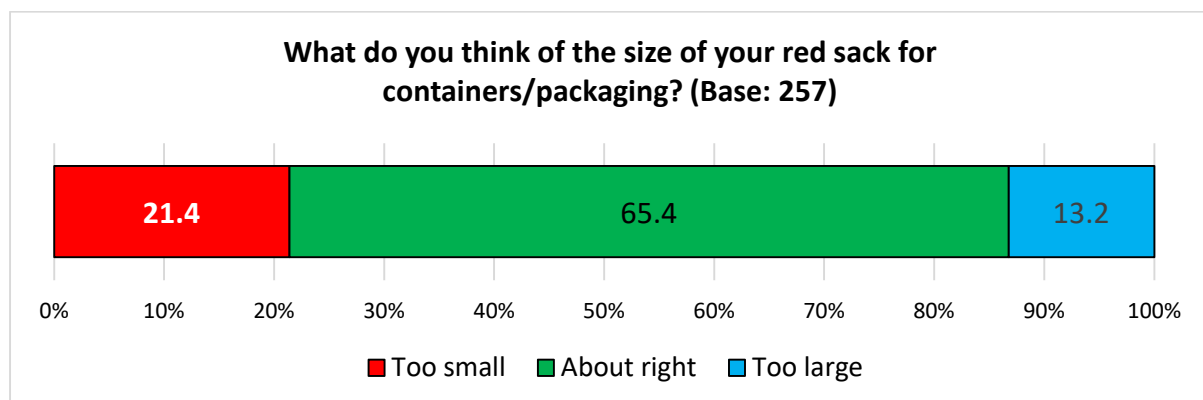
Over half (52.3%) had no opinion on the colour of the sack for recycling paper and cardboard; 43.8% were happy with the colour, whilst 3.9% were not.



Packaging (cans, tins and plastic bottles/tubs/trays) is collected in a red, re-useable sack. The sack is 90L. A standard green recycling bag is 60L in comparison. The sacks are weighted at 500g, which is the standard weight used across Wales. The sacks also have a lid, which is secured by Velcro.

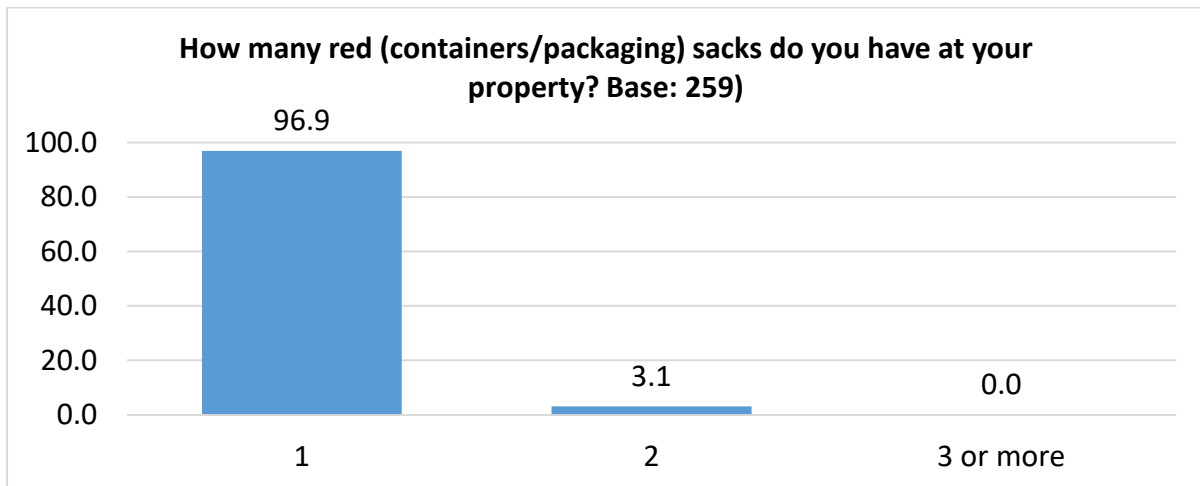
### What do you think of the size of your red sack for containers/packaging?

Around two-thirds (65.4%) of respondents felt the red sack was about the right size, compared with 67.8% for the blue sack; 13.2% felt the red sack was too large, whilst 21.4% felt it was too small (reflecting the findings for the blue sack).



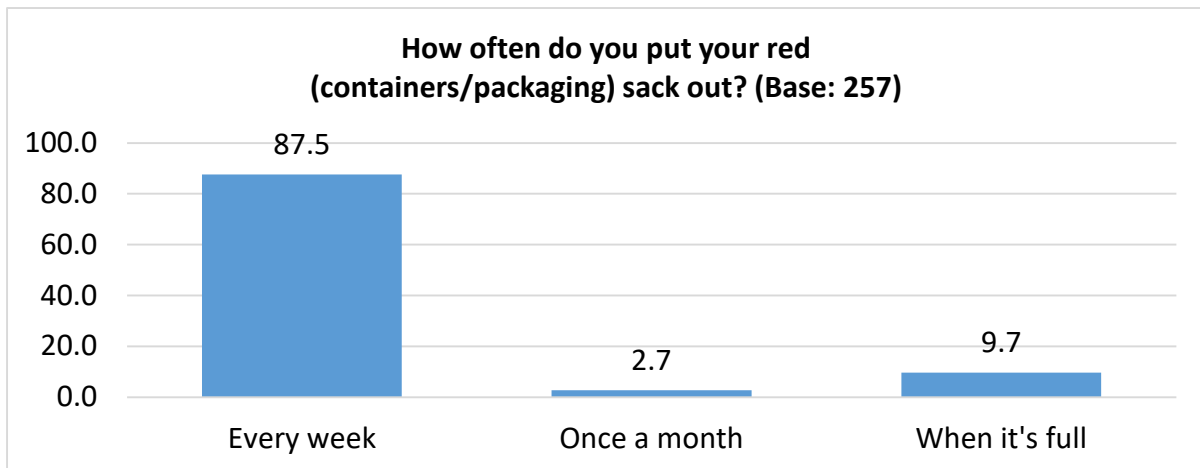
How many red (containers/packaging) sacks do you have at your property?

Most respondents (96.9%) had one red sack for their household, 3.1 had two (compared with 1.9% having two blue sacks).



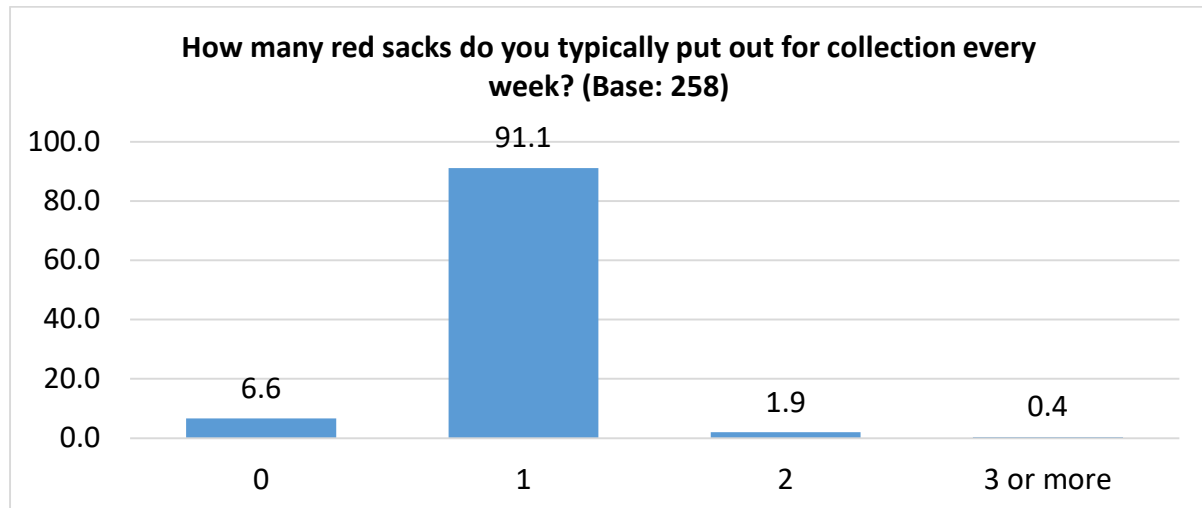
How often do you put your red (containers/packaging) sack out?

Seven out of eight respondents (87.5%) put their red sack of containers/packaging out for recycling collections every week (on a par with the 86.5% for the blue paper/cardboard sack), 9.7% waiting until it is full, and 2.7% once a month.



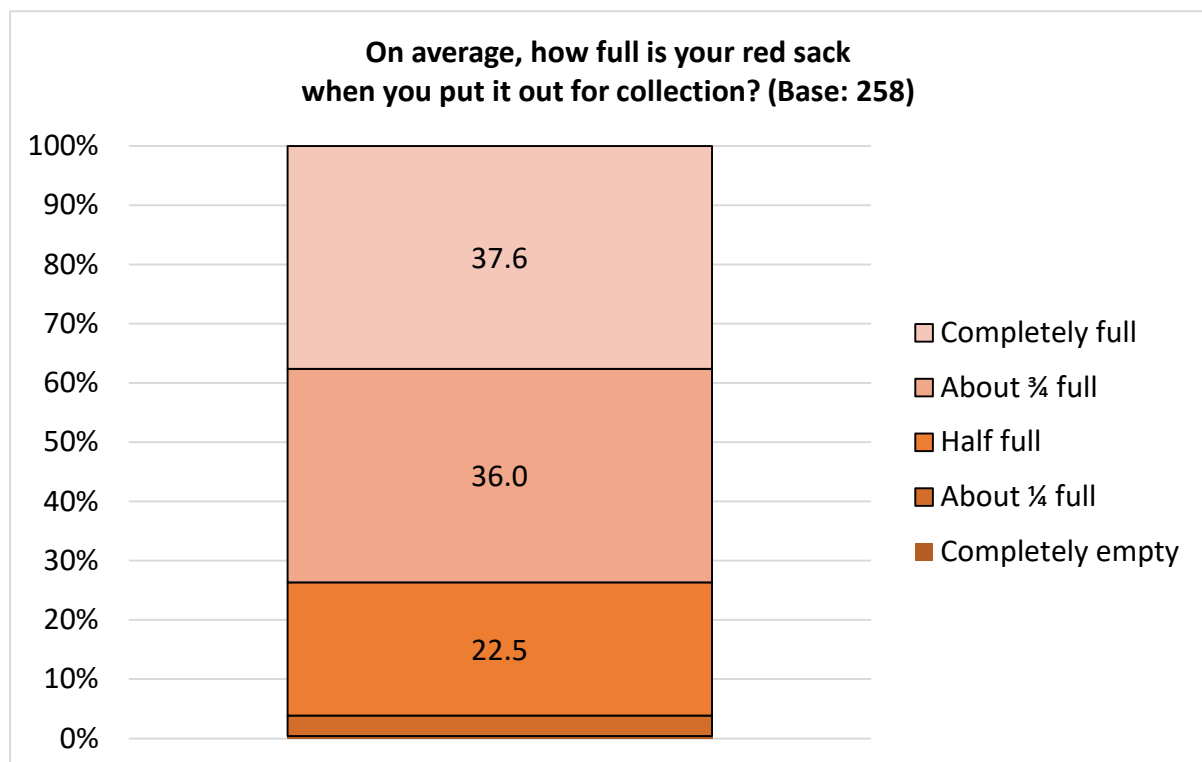
How many red sacks do you typically put out for collection every week?

The proportion of red sacks put out for collection every week matched that for the blue sacks, with over nine in ten (91.1%) putting one sack out every week (again reflecting the number of sacks each household reported to have).



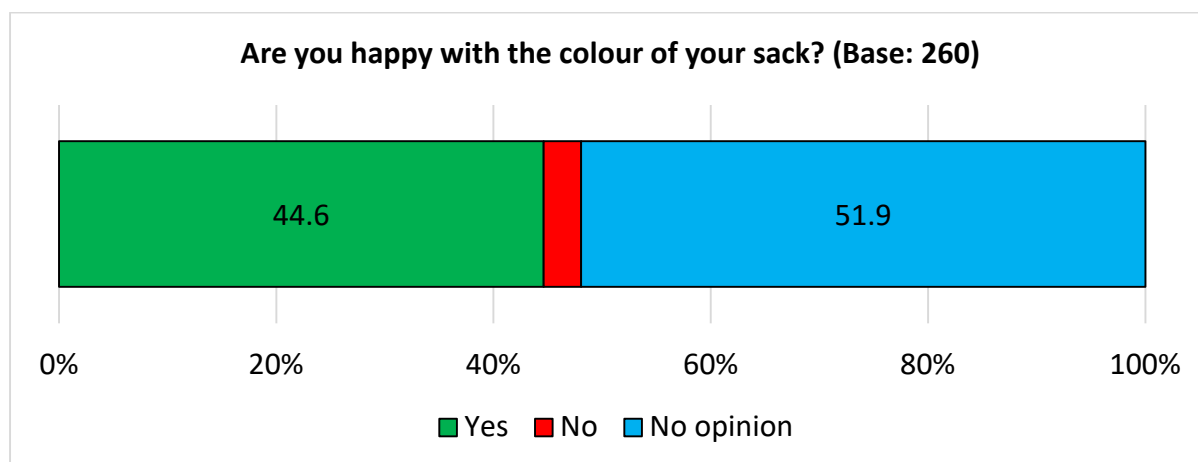
On average, how full is your red sack when you put it out for collection?

Again, the findings for the use of the red sack matched that of the blue sacks, with just over a third (37.6%) reporting it was 'completely full' when put out for collection, and 96.1% reporting the sack was at least half full.



### Are you happy with the colour of your sack?

Again, the findings for happiness with the colour of the red sack reflected that seen for the blue sack, with 44.6% happy, 3.5% unhappy, and 51.9% having no opinion.

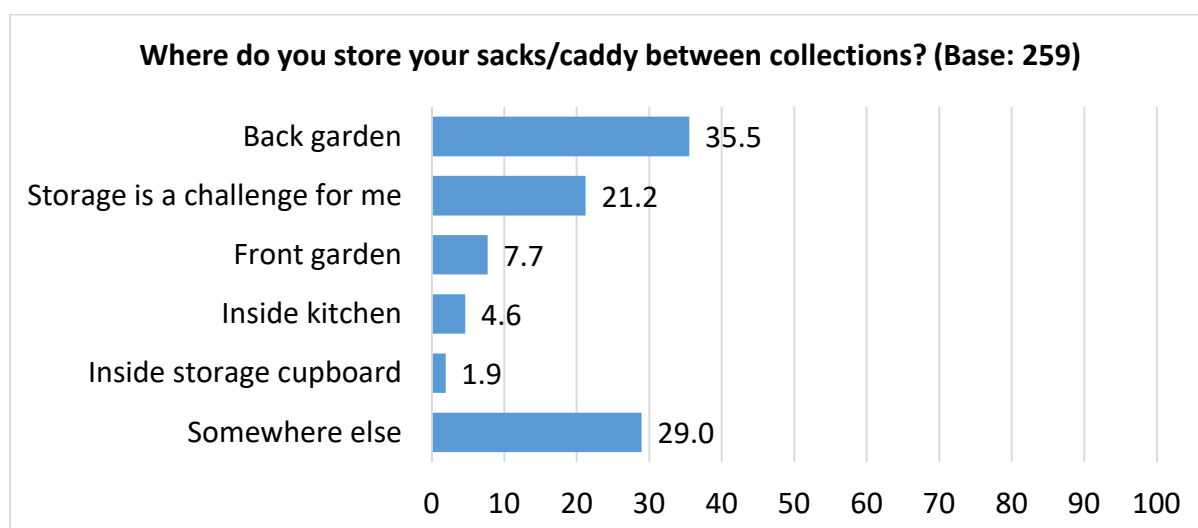


### Where do you store your sacks/caddy between collections?

Respondents were given a list of options, and asked which they used to store their sacks and caddy for the separate recycling pilot.

Most respondents reported storing the sacks and caddy used for separate recycling in their back garden (35.5%), with a further 7.7% using their front garden, and 6.6% storing them inside.

A fifth (21.2%) reported that storage of the sacks and caddy was a challenge.



### If somewhere else, please specify:

Those who said they store the sacks and caddy somewhere else than this list of options provided were asked for further details – 73 comments were received, and grouped into the following themes:

Theme	No	%	Example Comment
<b>Garage / Shed</b>	46	63.0	<ul style="list-style-type: none"> <li>– <i>I am fortunate to have a garage. I feel sorry for those that do not and have to have this clutter in their houses.</i></li> <li>– <i>In connected garage. Not a problem as they sit where the bins I used to use for green bags</i></li> <li>– <i>Garage, nowhere to keep them in the house too bulky</i></li> <li>– <i>Shed</i></li> </ul>
<b>Inside House</b>	9	12.3	<ul style="list-style-type: none"> <li>– <i>In the house as I have nowhere else to put them.</i></li> <li>– <i>In cupboard under stairs</i></li> </ul>
<b>Inside another bin</b>	7	9.6	<ul style="list-style-type: none"> <li>– <i>folded down inside black bin when not in use-take up too much space otherwise</i></li> <li>– <i>Inside green wheelie bin &amp; sort recycling night before collection</i></li> </ul>
<b>On drive/parking space</b>	5	6.8	<ul style="list-style-type: none"> <li>– <i>Parking space at back of garden</i></li> <li>– <i>End of drive near side garden gate</i></li> </ul>
<b>External Alleyway / Passageway</b>	3	4.1	<ul style="list-style-type: none"> <li>– <i>In an undercover alleyway around the side of our property.</i></li> </ul>
<b>Garden</b>	2	2.7	<ul style="list-style-type: none"> <li>– <i>Back garden for blue caddy</i></li> </ul>
<b>Other</b>	5	6.8	<ul style="list-style-type: none"> <li>– <i>Storing is a challenge. Store in a number of locations to help dry/clean them out after each collection, before re-using.</i></li> <li>– <i>I hate putting any bins or caddies or sacks inside the house, even inside the garden. I was lucky enough to find a corner behind a wall, but no other house will be as lucky as I was. It is not clean to store any of these inside the home. Yuk.</i></li> </ul>

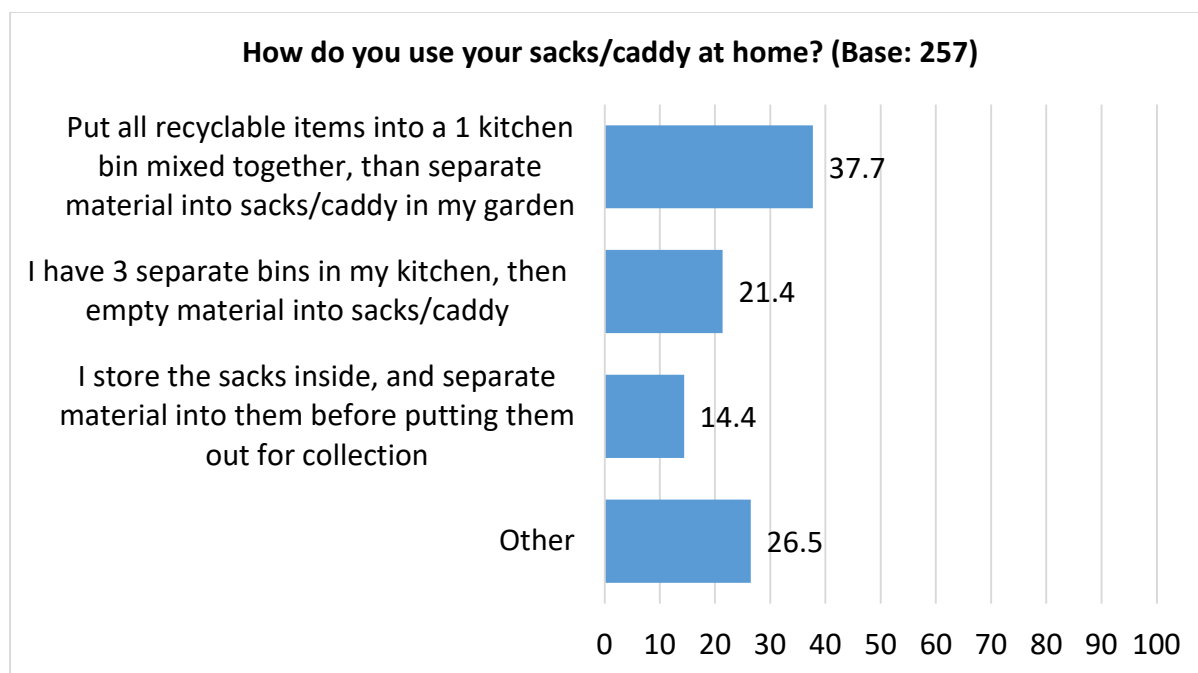


### How do you use your sacks/caddy at home?

Just over a third of respondents (37.7%) used a single receptacle to store all of their recycling in their kitchen, before separating the contents into the separate containers for collection, while a fifth (21.4%) used separate storage in their kitchen before moving the contents into the sacks/caddy for collection.

One in seven (14.4%) stored the sacks inside, using them to separate the materials as they went along, before putting each out for collection.

A quarter of respondents (26.5%) used another system.



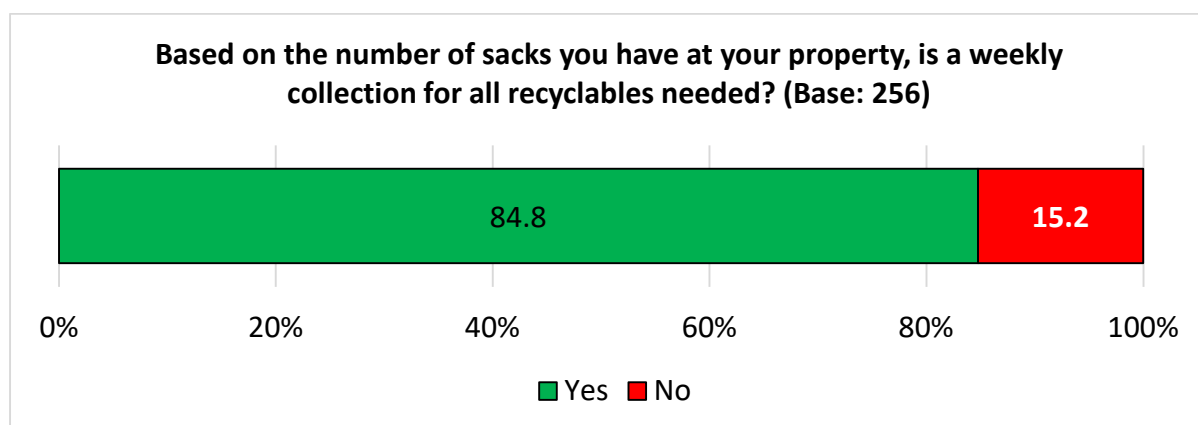
Those answering ‘Other’ were asked for further details – 64 comments were received, and grouped into the following themes:

Theme	No	%	Example Comment
<b>Take out separated items immediately</b>	35	54.7	<ul style="list-style-type: none"> <li>– Take items directly to the garage and place in the appropriate sack.</li> <li>– I put each item in the correct sack as i go but i find this really frustrating.</li> <li>– Items straight into sacks</li> <li>– Make numerous trips to the garden to put items in the bags.</li> <li>– We just sort it as we go.</li> </ul>
<b>Collect indoors then transfer to bags</b>	19	29.7	<ul style="list-style-type: none"> <li>– I use my recycling bin in house for containers which I empty into red bag once a week</li> <li>– It gets piled up in my conservatory, mixed, until it reaches a point where I need to put the rubbish into its respective bag. I do this maybe twice or three times a week.</li> </ul>

			<ul style="list-style-type: none"> <li>– Put all in a green bag and then sort which is time consuming and inconvenient particularly in winter - dark and inclement weather</li> </ul>
<b>Other</b>	13	20.3	<ul style="list-style-type: none"> <li>– All waste goes now into the black bin I have stopped recycling completely this pilot so off putting</li> <li>– Plastics, tins and paper is inside but glass is outside, but I have a large house. Most houses won't have room to separate recyclables indoors.</li> <li>– Recycling bags kept outside in a box (which I bought as they are too flimsy)</li> </ul>

Based on the number of sacks you have at your property, is a weekly collection for all recyclables needed?

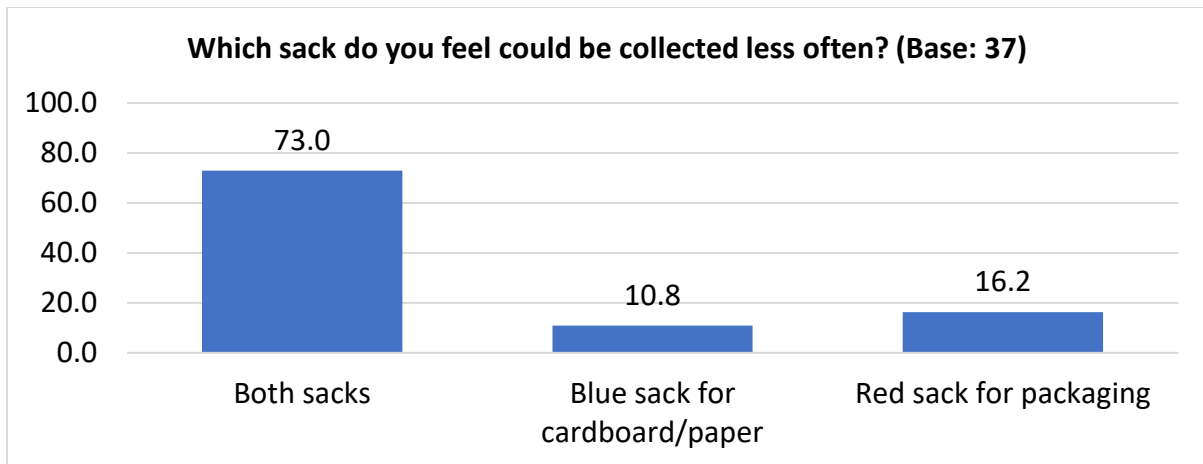
Around six out of seven respondents (84.8%) were satisfied that a weekly collection was needed for all types of recyclables.



Which sack do you feel could be collected less often?

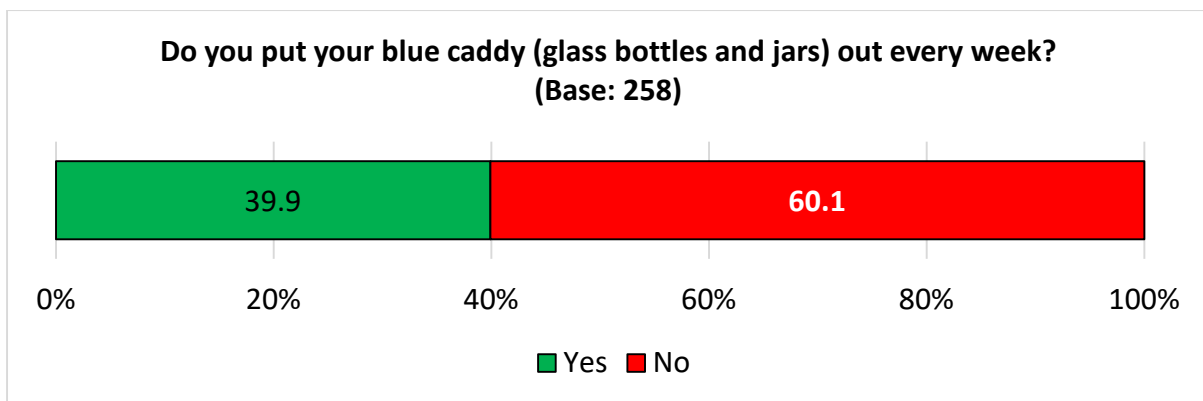
Those who felt a weekly collection was not needed were asked which needed to be collected most often.

Of the 37 responses received, almost three-quarters (73.0%) felt both sacks could be collected less often, 16.2% felt the red sack used for packaging required less frequent collections, whilst one in ten (10.8%) felt the blue sack for paper/cardboard could be collected less than once a week.



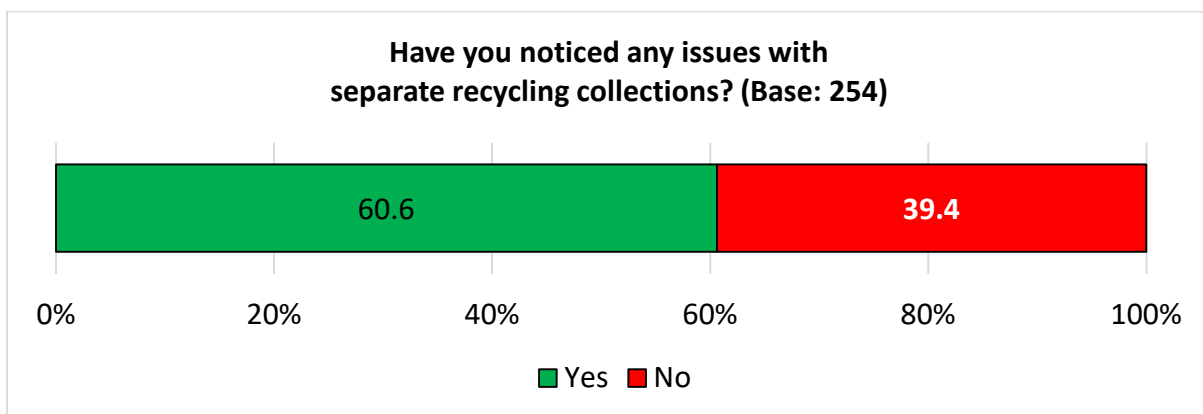
Do you put your blue caddy (glass bottles and jars) out every week?

Two-fifths of respondents (39.9%) reported that they put their blue caddy to recycle glass bottles and jars out for collection every week.



Have you noticed any issues with separate recycling collections?

Three fifths (60.6%) of respondents reported issues with the separate recycling collection.



If yes, please specify:

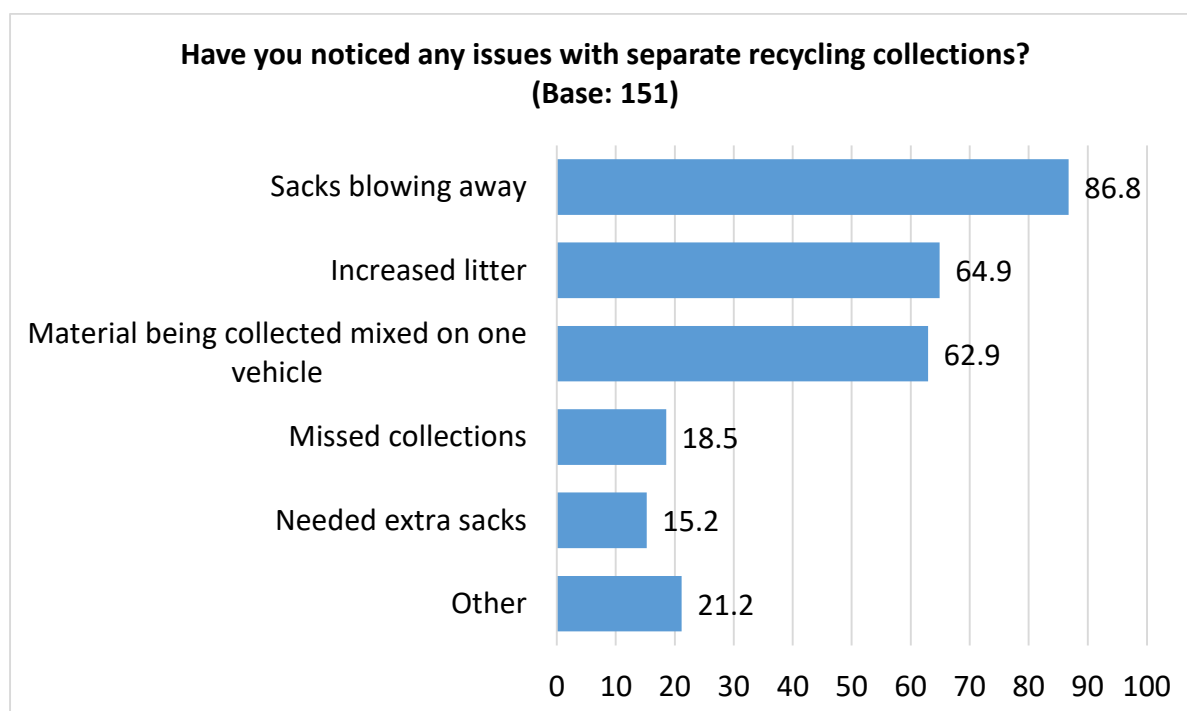
Those noticing issues were asked for further details, and were given a list of potential problems, as well as the option to add comments in their own words.

The biggest issue reported was that of sacks blowing away, with 86.8% of respondents answering this question highlighting this issue.

Over three in five respondents noted an increase in litter (64.9%), or that separated materials were then mixed on the vehicle collecting the recycling (62.9%).

Just under one in five (18.5%) reported missed collections, whilst 15.2% needed extra sacks.

A fifth of respondents (21.2%) reported other issues.



If 'Other', please specify:

Those answering 'Other' were asked for further details – 31 comments were received and grouped into the following themes:

Theme	No	%	Example Comment
<b>Concerns around Collection</b>	9	29.0	<ul style="list-style-type: none"> <li>Time of collections is spread too widely through day and night. If we had a 3 hour window the bags and contents would be less likely to spill/ be blown around</li> <li>Shredded paper in blue sacks when being emptied, is haphazardly done, with loads of paper waste falling on the road and No effort made by THE BIN MEN TO CLEAR UP THE MESS THEY HAVE CREATED.</li> </ul>

<b>Concerns around sack quality / design</b>	8	25.8	<ul style="list-style-type: none"> <li>– Sacks not waterproof, paper gets soaked</li> <li>– If you are going to ask people to separate refuse into different waste streams, then the containers must be as user friendly as possible. The bags are completely useless</li> </ul>
<b>Bags cause obstructions / safety issues</b>	5	16.1	<ul style="list-style-type: none"> <li>– There are so many bins and bags in the courtyard that they cause obstructions, and our elderly neighbours find them a hinderance</li> <li>– Now so many separate bins that pavements are blocked in many places causing safety issues</li> </ul>
<b>Concerns around reclaiming correct bags</b>	3	9.7	<ul style="list-style-type: none"> <li>– Bags in road, very dangerous, trespassing on properties to retrieve lost bags</li> </ul>
<b>Other</b>	5	16.1	<ul style="list-style-type: none"> <li>– It is a waste of time and resources and will make next to no difference to the final outcome. Please revert to what we had before, i.e., green bags, as many as we need to put out.</li> <li>– I now have a black bin, a green bin, a brown caddy, a blue glass caddy, a red bag and a red bag 6 in total. It appears that residents are now expected to carry out Cardiff's recycling program despite paying the local authority to carry this out on our behalf. If it is decided to roll out this scheme and residents do the recycling for the local authority, I will certainly expect a reduction in my community tax.</li> </ul>

Do you have any other comments you'd like to make about the separate recycling pilot?

Respondents were invited to leave any comments they felt had not been covered elsewhere in the survey. A total of 177 comments were received, and grouped into the following themes:

Theme	No	%	Example Comment
<b>Concerns around bag design / quality</b>	161	56.1	<ul style="list-style-type: none"> <li>– <i>The bags are too light and are blown away when empty. I have to locate my bags as they are often in the road or in a neighbour's garden. I have a large piece of wood that the refuse collectors place on the bags to stop them blowing away.</i></li> <li>– <i>The plastic glass caddy can be heavy to move too. The blue and red bags blow around in high winds.</i></li> <li>– <i>The sacks are not fit for purpose as they get wet inside and blow away. Your hardworking staff throw the emptied bins anywhere on the pavement. As they are not numbered, I worry that my bin could get mixed up with any of my neighbours who may have any disease or dirt ridden contents in their bag. The red and blue sacks need to be numbered and made of recycled plastic like the blue ones</i></li> <li>– <i>The woven material is difficult to clean, and the sacks are not waterproof or sturdy enough to store outside but by far the biggest problem is them blowing around the street which can be dangerous.</i></li> <li>– <i>It is not always easy to put recycling into the red sacks. Usually I have to stand on part of the bag, rip the Velcro open with one hand and put recycling in. Sometimes if I try to post things through the gap at the top, things fall out the other side. I love recycling but not sure about the sacks.</i></li> </ul>
<b>Storage</b>	79	27.5	<ul style="list-style-type: none"> <li>– <i>Storage of sacks an issue. No room inside for so many receptacles and a struggle to find room in the garage. They need spreading out to dry after time kerbside after collection.</i></li> <li>– <i>I can't be lugging sacks through my home.</i></li> <li>– <i>Although the concept is grand the practicality is a different matter - it takes a great amount of space either inside or outside your property to store the bags and bins and most properties are not designed for them.</i></li> <li>– <i>It's too much to store in the small garden we have it's taking over on is unsightly.</i></li> </ul>
<b>Increased litter / Mess / Vermin</b>	55	19.2	<ul style="list-style-type: none"> <li>– <i>Support recycling and separation of material but very unhappy with these blue and red sacks which</i></li> </ul>

			<p><i>are unfit for purpose - causing major littering which is very demoralising.</i></p> <ul style="list-style-type: none"> <li><i>– Locally noticed a marked increase in dumping of green sacks and general household waste in the locality directly impacting on wildlife and general environment.</i></li> <li><i>– Council staff collecting the waste trying to empty the blue caddy into a moving vehicle. This resulted in broken glass all over the road which needed to be cleaned up by torchlight as it was dark at the time of the collection. This was not acceptable as children play in the street and numerous cars using the road could incur punctures.</i></li> </ul>
<b>Collection Concerns</b>	50	17.4	<ul style="list-style-type: none"> <li><i>– Why bother to separate when all go into one container? I would like to know what happens at the depot.</i></li> <li><i>– Until the council have the correct vehicles for collection this is a pointless exercise.</i></li> <li><i>– What is the point of us separating everything when they just get put together in the truck.</i></li> </ul>
<b>Alternative suggestions / ideas</b>	28	9.8	<ul style="list-style-type: none"> <li><i>– I am a household of only 1 so obviously not accumulating as much waste as a family of 4 so weekly collections maybe required. Propose a wheely sized bin with colour coded draws to store items in or stackable plastic containers.</i></li> <li><i>– Why do a pilot in easy areas? If you want to do a trial, do it somewhere congested or a busy road.</i></li> </ul>
<b>Generally, against the scheme</b>	25	8.7	<ul style="list-style-type: none"> <li><i>– Abandon it.</i></li> <li><i>– Awful scheme.</i></li> </ul>
<b>Time / energy taken to separate the recycling</b>	21	7.3	<ul style="list-style-type: none"> <li><i>– Makes it more difficult to recycle as need to resort waste.</i></li> <li><i>– I really don't have the time or energy once I come home from work to go through and separate all my items into these bags, I'm finding if I'm too tired or the weather is too bad to separate, I leave until the following week to put out which is leading to a huge amount of rubbish backing up. I much prefer the green bags, so much easier to put out. I am finding it really stressful.</i></li> </ul>
<b>Positive Comments</b>	20	7.0	<ul style="list-style-type: none"> <li><i>– Very happy with pilot, hopefully this will become permanent.</i></li> <li><i>– I think it is a much needed scheme to reach the city's goals for recycling.</i></li> </ul>
<b>Concerns around amount and size of bags / caddies</b>	19	6.6	<ul style="list-style-type: none"> <li><i>– How many caddies can one house have? Come Christmas time they will all be full when each house has around 6 green recycling bags and the council have trouble collecting on time.</i></li> </ul>

			<ul style="list-style-type: none"> <li>– <i>I now have a total of six bins - black, glass, paper/card, food, plastic/tins and garden - it's unmanageable! I understand the need to recycle and support it but not in this format, it seems that it's more about making the council workers lives easier but the general public's harder. I'm fed up of having to stand in the pouring rain every week to separate my recycling. The bags are not fit for purpose and in my opinion - unhygienic. The time it takes me to sort my rubbish out every week has tripled. Surely there is a better way?!</i></li> </ul>
<b>Revert back to green bags</b>	17	5.9	<ul style="list-style-type: none"> <li>– <i>Go back to the green bag collection service. the problems caused by the pilot will then cease.</i></li> <li>– <i>Please go back to the original way of using green sack for all recycling waste. Also, it's very difficult to put shredded paper in the blue sack.</i></li> </ul>
<b>Black bin waste has increased</b>	12	4.2	<ul style="list-style-type: none"> <li>– <i>Black bin waste has doubled as many items now not able to be placed in sacks e.g. certain plastics, kitchen roll paper.</i></li> </ul>
<b>Waste of taxpayers' Money</b>	11	3.8	<ul style="list-style-type: none"> <li>– <i>It's wasted taxpayer money from beginning to end. It disrespects me as a human and my need for health and safety.</i></li> </ul>
<b>More needs to be done around soft plastics / Tetra packs / films</b>	9	3.1	<ul style="list-style-type: none"> <li>– <i>As stated earlier, we are very committed to recycling, and want more to be done to make recycling percentage higher but feel that it needs to be made more accessible for people and for less reasons for people not to recycle. also feel that some items should be able to be recycled at home (like tetra packs). to reduce use of single use recycling bags is great, but surely one hard multi use plastic bin, like black and garden waste bins, would make recycling simple and keep percentages higher.</i></li> </ul>
<b>Increased recycling awareness</b>	5	1.7	<ul style="list-style-type: none"> <li>– <i>Generally working well and helping to educate people on what should be in the sacks.</i></li> </ul>
<b>Other</b>	35	12.2	<ul style="list-style-type: none"> <li>– <i>We've had to purchase additional waste bins for inside the house.</i></li> <li>– <i>My main concern is that when the sacks are full there will be financial implications for residents, i.e. having to pay for extra collections or having to travel to a recycling centre.</i></li> <li>– <i>I've still got the original blue box for glass bottles etc, must have been very expensive to issue new ones for this second pilot scheme.</i></li> </ul>



## About You

What was your age on your last birthday?

	No	%
<b>16-24</b>	1	0.4
<b>25-34</b>	28	10.7
<b>35-44</b>	43	16.4
<b>45-54</b>	49	18.7
<b>55-64</b>	66	25.2
<b>65-74</b>	53	20.2
<b>75+</b>	16	6.1
<b>Prefer not to say</b>	6	2.3
<b>Total</b>	<b>262</b>	<b>100.0</b>

Are you...?

	No	%
<b>Female</b>	226	63.3
<b>Male</b>	125	35.0
<b>Prefer not to say</b>	6	1.7
<b>Total</b>	<b>357</b>	<b>100.0</b>

Do you identify as Trans?

	No	%
<b>No</b>	239	95.6
<b>Prefer not to say</b>	10	4.0
<b>Other</b>	1	0.4
<b>Total</b>	<b>250</b>	<b>100.0</b>

Do any children live in your household?

	No	%
<b>No children</b>	166	64.3
<b>Yes, under 5 years old (pre-school)</b>	28	10.9
<b>Yes, aged 5 - 11 (primary school)</b>	46	17.8
<b>Yes, aged 11 - 16 (secondary school)</b>	27	10.5
<b>Yes, aged 16 - 18</b>	22	8.5
<b>Total</b>	<b>258</b>	-

Which of the following best describes what you are doing at present?

	No	%
<b>Working full time (30+ hours per week)</b>	118	45.4
<b>Working part time (less than 30 hours per week)</b>	33	12.7
<b>Permanently sick or disabled person</b>	5	1.9
<b>Wholly retired from work</b>	84	32.3
<b>Looking after home</b>	4	1.5
<b>Other</b>	13	5.0
<b>Caring for a child or adult</b>	3	1.2
<b>Total</b>	<b>260</b>	<b>100.0</b>

Please tick any of the following that apply to you:

	No	%
<b>Deaf/ Deafened/ Hard of hearing</b>	10	12.3
<b>Mental health difficulties</b>	13	16.0
<b>Learning impairment/ difficulties</b>	2	2.5
<b>Visual impairment</b>	4	4.9
<b>Wheelchair user</b>	1	1.2
<b>Mobility impairment</b>	13	16.0
<b>Long-standing illness or health condition (e.g. cancer, diabetes, or asthma)</b>	30	37.0
<b>Prefer not to say</b>	26	32.1
<b>Other</b>	7	8.6
<b>Total</b>	<b>81</b>	<b>-</b>

Do you consider yourself to be Welsh?

	No	%
<b>Yes</b>	168	69.4
<b>No</b>	74	30.6
<b>Total</b>	<b>242</b>	<b>100.0</b>

What is your ethnic group?

*(Where the term 'British' is used, this refers to any of the four home nations of Wales, England, Northern Ireland and Scotland, or any combination of these).*

	No	%
White - Welsh/English/Scottish/Northern Irish/British	232	88.9
White - Irish	2	0.8
White - Any other white background	7	2.7
Mixed/Multiple Ethnic Groups	2	0.8
Black/African/Caribbean/Black Welsh/British	3	1.1
Asian/Asian Welsh/British	6	2.3
Other	1	0.4
Prefer not to say	8	3.1
<b>Total</b>	<b>261</b>	<b>100.0</b>

Mae'r dudalen hon yn wag yn fwriadol

Equality Impact Assessment  
Corporate Assessment Template

<b>Policy/Strategy/Project/Procedure/Service/Function Title: Recycling Strategy 2022-2025</b>
<b>New/Existing/Updating/Amending: New</b>

<b>Who is responsible for developing and implementing the Policy/Strategy/Project/Procedure/Service/Function?</b>	
Name: Claire Cutforth	Job Title: OM Strategy and Performance
Service Team: Waste Strategy	Service Area: Recycling Services
Assessment Date: 14.9.22	

**1. What are the objectives of the Policy/Strategy/Project/ Procedure/ Service/Function?**

The science is clear that we will soon be facing a point of irreversible and catastrophic climate change, unless we take drastic action now. Nowhere is this more apparent than in the amount of waste we produce. It is, perhaps, the most visual example of our climate footprint and driving up recycling will make a major contribution to the planet as it conserves natural resources, reduces demand for raw material, saves energy and cuts emissions.

Wales is currently the third best nation for recycling worldwide with Cardiff performing well in relation to other core cities in the UK. However, we lag behind other authorities in Wales in terms of our recycling performance. The Welsh Government has set a statutory target to recycle 64% of all municipal waste by 2019/20, and 70% by 2024/25. Cardiff fell significantly short of the 64% recycling target in 2019/20, achieving only 58% recycling.

The main objective of the Recycling Strategy is to set out how Cardiff will meet and exceed the recycling targets and move towards more sustainable resource management. The strategy focuses on three key areas of intervention:

1. Improving the recycling performance of the Council’s Trade waste service.
2. Expanding the residential recycling service to include new segregation streams.
3. Diverting recyclable materials from the residual (non-recyclable) waste stream through waste restriction.

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For residents the main impacts will be changes to the kerbside recycling and waste collections, with a potential reduction in residual waste collection frequency and recycling being segregated into 3 containers:

- Caddies for glass
- Reusable sack for fibres (paper and card)
- Reusable sack for containers (plastics and cans)

This document assesses the impacts of the proposed changes and identifies mitigations.

**2. Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]**

Glass caddies have previously been trialled, as part of the glass bottled and jars trial and there is an EQIA associated with this.

Similar schemes are in operation in neighbouring authorities – The Vale, Monmouth, Swansea, Newport.

In developing the Waste Strategy, and the proposed collection model, Cardiff has worked very closely with WRAP Cymru and other Welsh Authorities.

The Strategy has been out for public consultation via Cardiff Research Centre.

- The survey was promoted via the council's corporate Facebook, Twitter and Instagram accounts throughout the consultation period, receiving a total of 783 clicks
- There was also a paid-for social media ad campaign targeting all areas of the city, with added focus on areas of the city with traditionally low-response rates to consultations. The ads generated 2,917 clicks through to the consultation site and the ads were viewed 244,569 times (impressions).
- The survey was hosted on the Council website, and promoted to Council employees via DigiGov, Intranet and Staff Information.
- The survey was sent to the Citizens Panel which is made up of over 6,000 Cardiff residents.

A Pilot commenced in February 2021 to test the 3 stream recycling service. Participants were surveyed to obtain feedback on the scheme. Whilst on the whole residents adapted well to the scheme, some feedback was received relating to the reusable sacks, which will be taken into account before expanding the service city wide.

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### 3 Assess Impact on the Protected Characteristics

#### 3.1 Age

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative/]** on younger/older people?

	Yes	No	N/A
Up to 18 years	X		
18 - 65 years	X		
Over 65 years	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

These changes will impact people of all ages.

They will now have to segregate their recycling rather than place it all in one bag. This could be confusing for some residents. Some residents may find caddies or sacks more problematic to manage than green bags.

Collection frequencies may change, which could be confusing for some residents.

Larger households may struggle to manage residual waste volumes.

**What action(s) can you take to address the differential impact?**

We offer an assisted collection service.

Education literature will be provided, and support and advice will be available via telephone or email for residents or their carers.

Additional capacity is available for larger households.

The Waste Strategy team can arrange visits for those struggling to manage their waste.

Information will be pictorial wherever possible to accommodate for different languages. Officers will also undertake outreach in the community to understand any requirements for translation.

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**Equality Impact Assessment  
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**3.2 Disability**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment	X		
Physical Impairment	X		
Visual Impairment	X		
Learning Disability	X		
Long-Standing Illness or Health Condition	X		
Mental Health	X		
Substance Misuse	X		
Other			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

These changes will impact all people. Whilst there will be 3 recycling streams, rather than 1, residents can place out more than 1 green bag, so it does not follow that there will be more recycling containers on the streets. However, this risk must be considered and planned for.

**What action(s) can you take to address the differential impact?**

We offer an assisted collection service.

Education literature will be provided, and support and advice will be available via telephone or email for residents or their carers.

Caddies/bins can offer a preferred method of containing waste for the visually impaired as they contain waste more securely and are more easily detected.

Different sacks will be trialled as part of the pilot to see whether smaller/dual material sacks are beneficial in high density areas (i.e. reducing volume of sacks/waste on streets).

The Waste Strategy team can arrange visits for those struggling to manage their waste.

Alternative communication formats will be considered where necessary to ensure all disabled people are informed of the proposed changes.



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**3.3 Gender Reassignment**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
<b>Transgender People</b> (People who are proposing to undergo, are undergoing, or have undergone a process [or part of a process] to reassign their sex by changing physiological or other attributes of sex)		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The changes will apply to everyone using our service.

We offer an assisted collection service.

Education literature will be provided, and support and advice will be available via telephone or email for residents or their carers.

**What action(s) can you take to address the differential impact?**

No differential impact identified at this time. No action necessary.

**3.4. Marriage and Civil Partnership**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on marriage and civil partnership?

	Yes	No	N/A
Marriage			X
Civil Partnership			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The changes will apply to everyone using our service.

We offer an assisted collection service.

Education literature will be provided, and support and advice will be available via telephone or email for residents or their carers.

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<b>What action(s) can you take to address the differential impact?</b>
No differential impact identified at this time. No action necessary.

**3.5 Pregnancy and Maternity**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy		X	
Maternity	X		

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
Waste capacity could be an issued for families with nappies.
<b>What action(s) can you take to address the differential impact?</b>
Hygiene service is available.

**3.6 Race**

Will this Policy/Strategy/Project//Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White			X
Mixed / Multiple Ethnic Groups			X
Asian / Asian British			X
Black / African / Caribbean / Black British			X
Other Ethnic Groups			X

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**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The changes will apply to everyone using our service.

Information will be pictorial wherever possible to accommodate for different languages. Officers will also undertake outreach in the community to understand any requirements for translation.

We offer an assisted collection service.

Education literature will be provided, and support and advice will be available via telephone or email for residents or their carers.

Additional capacity is available for larger households.

**What action(s) can you take to address the differential impact?**

No differential impact identified at this time. No action necessary.

**3.7 Religion, Belief or Non-Belief**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist			X
Christian			X
Hindu			X
Humanist			X
Jewish			X
Muslim			X
Sikh			X
Other			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The changes will apply to everyone using our service.

We offer an assisted collection service.

Education literature will be provided, and support and advice will be available

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via telephone or email for residents or their carers.

Additional capacity is available for larger households.

**What action(s) can you take to address the differential impact?**

No differential impact identified at this time. No action necessary.

**3.8 Sex**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on men and/or women?

	Yes	No	N/A
Men			x
Women			x

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The changes will apply to everyone using our waste service.

We offer an assisted collection service.

Education literature will be provided, and support and advice will be available via telephone or email for residents or their carers.

**What action(s) can you take to address the differential impact?**

No differential impact identified at this time. No action necessary.

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**3.9 Sexual Orientation**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Bisexual			X
Gay Men			X
Gay Women/Lesbians			X
Heterosexual/Straight			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The changes will apply to everyone using our service.

We offer an assisted collection service.

Education literature will be provided, and support and advice will be available via telephone or email for residents or their carers.

**What action(s) can you take to address the differential impact?**

No differential impact identified at this time. No action necessary.

**3.10 Socio-economic Duty**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the Socio-economic Duty?

	<b>Yes</b>	<b>No</b>	<b>N/A</b>
	X	X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

There are no foreseen socio-economic impacts.

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**What action(s) can you take to address the differential impact?**

No differential impact identified at this time. No action necessary.

**3.11 Welsh Language**

Will this Policy/ Strategy/Project/Procedure/Service/Function have a **differential impact (positive/negative)** on the Welsh Language?

	Yes	No	N/A
			x

**Please give details/ consequences of the differential impact, and provide supporting evidence, if any.**

There are no foreseen impacts based on the Welsh Language.

We offer an assisted collection service.

Education literature will be provided, and support and advice will be available via telephone or email for residents or their carers.

**What action(s) can you take to address the differential impact?**

All services will be provided bi-lingually.

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#### 4. Consultation and Engagement

What arrangements have been made to consult/engage with the various Equalities Groups?

The strategy was out for public consultation for 6 weeks in Spring 2022.

After data cleansing and validation, there were 3,305 responses to the consultation.

At least 80% of respondents within each demographic and geographic group agreed that Cardiff needs to improve the quality of material collected.

Almost half (48.8%) of respondents agreed that a three stream recycling system proposal was appropriate, and one in five (19.2%) felt that that a full kerbside sort collection should be considered. Based on this feedback, the expansion will include a 3 stream system, using a kerbside sort methodology.

Around one in three (32.0%) felt there should be different options for different areas of the City, and this will be reflected in a phased approach to expanding the service, giving specific consideration to the needs of HMO's and flats.

Some concerns were raised regarding container types (the reusable sacks used in the trial area), and different receptacles will be researched and tested prior to full roll out of the service.

#### 5. Summary of Actions [Listed in the Sections above]

Groups	Actions
Age	We offer an assisted collection service.  Education literature will be provided, and support and advice will be available via telephone or email for residents or their carers.
Disability	We offer an assisted collection service.  Education literature will be provided, and support and advice will be available via telephone or email for residents or their carers.
Gender Reassignment	
Marriage & Civil Partnership	
Pregnancy & Maternity	
Race	
Religion/Belief	

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Sex	
Sexual Orientation	
Socio-economic Duty	
Welsh Language	All services will be provided bi-lingually.
Generic Over-Arching [applicable to all the above groups]	<p>Promote the changes to service clearly and bi-lingually. Ensure engagement with community groups and ward Councillors to help explain changes to harder to reach groups.</p> <p>Information will be pictorial wherever possible to accommodate for different languages. Officers will also undertake outreach in the community to understand any requirements for translation. Ensure translation into common languages.</p> <p>Additional capacity is offered to larger households.</p>

#### 6. Further Action

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

#### 7. Authorisation

The Template should be completed by the Lead Officer of the identified Policy/Strategy/Project/Function and approved by the appropriate Manager in each Service Area.

Completed By : Claire Cutforth	Date: 14/09/22
Designation: OM – Strategy and Performance	
Approved By: Matthew Wakelam	
Designation: Assistant Director Street Scene	
Service Area: Recycling and Neighbourhood Services	

- 7.1 On completion of this Assessment, please ensure that the Form is posted on your Directorate's Page on CIS - *Council Wide/Management Systems/Equality Impact Assessments* - so that there is a record of all assessments undertaken in the Council.

For further information or assistance, please contact the Citizen Focus Team on 029 2087 2536 / 3262 or email [equalityteam@cardiff.gov.uk](mailto:equalityteam@cardiff.gov.uk)



**CARDIFF COUNCIL  
CYNGOR CAERDYDD**



**CABINET MEETING: 28 SEPTEMBER 2022**

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**RESPONSE TO ECONOMY AND CULTURE SCRUTINY COMMITTEE;  
REPORT ON COMMUNITY SPORT IN CARDIFF: REGIONAL SPORTS  
PARTNERSHIPS**

**CULTURE, PARKS & EVENTS (COUNCILLOR JENNIFER BURKE-  
DAVIES)**

**AGENDA ITEM: 4**

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**Reason for this Report**

1. To agree the Cabinet response to the Economy and Culture Scrutiny Committee report of January 2022 as contained in Appendix 1.

**Background**

2. Economy and Culture Scrutiny Committee reviewed the regionalisation of community sport proposed by Sport Wales.
3. Cabinet reviewed the report in February 2022 and recommended a response to be received within two cycles for the six recommendations in the report, as set out in Appendix 2.
4. A collaboration group of Local Authorities and Sport Wales has been set up with membership from all Central South Authorities (Cardiff, Vale of Glamorgan, Merthyr, Rhondda Cynon Taf and Bridgend)
5. The Council has set out its direction through the Physical Activity and Sport Strategy endorsed by Cabinet in January 2022.
6. Governance arrangements and year one implementation plan to deliver and monitor the strategy through a Senior Leadership Board are in place.
7. The strategy will be the basis of protection of Cardiff objectives as the new regionalisation model is developed.
8. The strategy has four key objectives that are aligned to the Sport Wales Vision for Sport and the Wellbeing Goals for the Well-being of Future Generations Act 2015 (Wales), as follows:

- Creating Active Systems
- Creating Active Environments
- Creating Active People
- Creating Active Societies

## **Issues**

9. The Economy and Culture Scrutiny Committee made six recommendations for Cabinet to consider, five of which are accepted and one of which is partially accepted as set out in Appendix 2.
10. Progress since the report was published:
  - Through our Joint Venture with Cardiff Metropolitan University, we are leading and administering the collaboration working group of all Local Authorities in the central south region - this is to ensure Cardiff is well represented and able to influence decisions.
  - Three workshops have been held with support and mediation provided by consultants appointed by Sport Wales.
  - Work is ongoing with regards to governance structures of any potential new entity and how each local authority will be represented.
  - A further collaboration workshop is scheduled for October 2022.
  - Draft structures and governance arrangements should be in place by April 2023 for further consideration by Cabinet.

## **Reason for Recommendation**

11. To agree the Cabinet response to the Economy and Culture Scrutiny Committees Recommendations for “Community Sport in Cardiff, Regional Sports Partnerships.”
12. Continue to participate in discussions with Sport Wales and Central South partners to ensure Cardiff objectives and resources are retained.

## **Financial Implications**

13. This report does not result directly in any additional financial implications.
14. It seeks agreement for the response to the Economic and Culture Scrutiny Committee recommendations to Community Sport in Cardiff: Regional Partnerships as set out in Appendix 1. The Cabinet response to these recommendations is as detailed in Appendix 2.
15. The report also provides an update with regard to ongoing collaboration and discussions between Central South Wales partners on the future proposal for a regional community sports body.
16. It is further proposed that draft structures and governance arrangements for any new entity to be established will be brought back to Cabinet for consideration early in the new financial year.

## **Legal Implications**

17. The purpose of this report is to consider and agree Cabinet’s response to the recommendations of the Economy and Culture Scrutiny Committee in connection with “Community Sport in Cardiff, Regional Sports Partnerships. There are no immediate legal implications arising from this report. However, legal implications may arise if and when the matters referred to are implemented with or without modification. Any subsequent report with recommendations for decision that are required by Cabinet or decision maker for the Council will set out any legal implications arising from those recommendations. All decisions taken by or on behalf of the Council must (a) be within the legal power of the Council; (b) comply with any procedural requirement imposed by law; (c) be within the powers of the body or person exercising powers on behalf of the Council; (d) be undertaken in accordance with the procedural requirements imposed by the Council e.g. standing orders and financial regulations; (e) be fully and properly informed; (f) be properly motivated; (g) be taken having regard to the Council’s fiduciary duty to its taxpayers; and (h) be reasonable and proper in all the circumstances.

## **Property Implications**

18. There are no property implications arising from this report.

## **Human Resources Implications**

19. There are no HR implications arising directly from the recommendations set out in this report. Any decisions taken by Sports Wales regarding the proposed Regional Sport Partnership will need to be fully assessed for any HR implications, and if necessary, such implications will be discussed with the trade unions through the Council’s agreed processes.

## **RECOMMENDATIONS**

Cabinet is recommended to agree the response to the Economic and Culture Scrutiny Committee Recommendations to “Community Sport in Cardiff: Regional Partnerships” as contained in Appendix 1 of this Report

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Neil Hanratty</b>
	Director of Economic Development 22 September 2022

The following appendices are attached -

- Appendix 1:** Economy and Culture Scrutiny Report “Community Sport in Cardiff: Regional Partnerships”
- Appendix 2:** Cabinet response to the Economy and Culture Scrutiny Report “Community Sport in Cardiff: Regional Partnerships”

Mae'r dudalen hon yn wag yn fwriadol



An Inquiry Report of the:  
**Economy & Culture Scrutiny Committee**

# **COMMUNITY SPORT IN CARDIFF: REGIONAL SPORTS PARTNERSHIPS**

January 2022



**Cardiff Council**

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## FOREWORD

*Regular physical activity is important to improve health and wellbeing and enhance the overall quality of life. Community Sport plays a vital role in helping people be physically active and this Inquiry also heard it helps increase community cohesion, tackle anti-social behaviour and crime, as well as assist lifelong learning.*

*Cardiff is fortunate to have a dedicated, enthusiastic team of volunteers who support over 400 community sports clubs in the city. We also benefit from an innovative Joint Venture between Cardiff Council and Cardiff Metropolitan University, enabling Sport Cardiff to work with partners to create opportunities for people to get involved in sport. This Committee has regularly received update reports on Sport Cardiff, focusing specifically on progress with increasing participation particularly amongst under-represented groups. We have been pleased to note success in these areas.*

*Members decided to undertake this Inquiry due to concerns raised with the Committee that proposals for Regional Sport Partnerships could undermine the successful work in Cardiff. We entered the Inquiry with an open mind, aiming to learn lessons from the early adopter Sport North Wales and identify what Cardiff Council needed to do to prepare for changes.*

*We heard from Cardiff Metropolitan University, Sport Cardiff, and Sport Wales, as well as from Councillor Bradbury, Cabinet Member – Culture and Leisure, and senior officers. We are grateful to all witnesses for their willingness to engage, their openness and clarity regarding their perspectives on proposals. We also invited representatives from the other local authorities in the proposed Central South Regional Sport Partnership (RSP) to contribute their views to the Inquiry. Regrettably, they felt unable to contribute at this stage, as they awaited clarification from Sport Wales on key aspects of proposals.*

*Having considered all the evidence, this Inquiry concludes the proposed Central South RSP poses a very real threat to the good practice currently embedded in Cardiff. We are sure that this is not the intention of Sport Wales, which wishes to see enhanced participation across Wales and particularly in the most disadvantaged communities.*

*Our clear preference is for the status quo to be maintained; our current approach delivers, boosting engagement and participation for the most disadvantaged. However, if maintaining the status quo is not feasible, then it is essential to reduce the footprint of the RSP and to clarify governance arrangements. The need for engagement with politicians is critical, and this Inquiry was pleased to note willingness from all parties to participate in this.*

*I would like to thank Cllr Iona Gordon for her contributions to this Inquiry and our Principal Scrutiny Officer, Angela Holt, for her professional support in bringing all of this together.*

*This is my last Inquiry Report as Chair of this Committee and I would like to thank members of my committee, past and present, for the way they have supported me during my period as Chair, as well as the Scrutiny Officers who have made everything possible.*

*For scrutiny to be effective, there needs to be a willingness from the administration to engage with us and to consider us a critical friend. As far as my committee is concerned, this has indeed been the case, with Cabinet Members and Officers eagerly engaging with us and responding positively to our observations and recommendations.*

*We are fortunate in Cardiff to have an extremely efficient and professional Scrutiny Service that leads the way in how it supports scrutiny in Cardiff. I hope that future administrations recognise this fact and continue to provide Scrutiny with the support it needs in order to continue to deliver effective scrutiny.*



**Chair, Economy & Culture Scrutiny Committee  
January 2022**



## TERMS OF REFERENCE

- To explore Sport Wales’s proposed Central South Community Sport and Activity programme to understand:
  - Progress to date re development of regional model
  - Proposed structure, governance, funding, and operation of regional model
  - Interface between community sports and the regional model
  - What success will look like.
- To consider the pilot Community Sport and Activity programme in North Wales:
  - Understand lessons learnt during the pilot
  - Identify lessons relevant to Central South
- To use the information gathered during the inquiry to:
  - undertake a SWOT analysis of the proposed Central South Community Sport and Activity programme
  - identify what Cardiff Council needs to do to prepare.
- To gather stakeholders’ views regarding the above, including partners, other local authorities included in Central South and relevant Cabinet Members and Cardiff Council officers.
- To make evidence-based recommendations to Cabinet regarding the Sport Wales Community Sport and Activity programme.

## KEY FINDINGS

### Reasons for Regional Sport Partnerships

KF1. The Welsh Government requires Sport Wales to maximise its contribution to achieving the goals of the Wellbeing of Future Generations Act 2015, with specified outcomes to boost activity for all and increase participation by those most in need or disadvantaged. Evidence indicates that women and girls, those with a disability, who live in poverty or who are from a BAME background are much less likely to be active or participate in sport more than 3 times a week.

KF2. In response to this, Sport Wales undertook comprehensive engagement to inform its new Vision for Sport. To deliver this vision, Sport Wales looked at regional sport partnership models used in England, Scotland, and New Zealand and developed a modified model they believe to be best suited for Wales. Following a business case analysis, Sport Wales proposed to split Wales into five regions, with Cardiff included in the Central South Regional Sport Partnership along with Bridgend, Merthyr, Rhondda Cynon Taf, and the Vale of Glamorgan.

KF3. Regional Sport Partnerships are the mechanism through which Sport Wales will direct its funding of community sport in a long-term approach. Sport Wales estimate that resource per Regional Sport Partnership will be circa £12million over 5 years.

### Rationale for Regional Sport Partnerships

KF4. Sport Wales stated the current ways of working are not sufficient to deliver the change required by Welsh Government and that Regional Sport Partnerships can deliver the scale of change required. A fresh approach, building on the success of current approaches, they promote a collaborative, insight-led, asset-based approach and enable collective learning. In addition, they can be used to boost the profile of sport, showing its added value in tackling not only physical and mental health and wellbeing, but community cohesion, anti-social behaviour, crime, skills development, and lifelong learning.

KF5. In addition, Sport Wales believe Regional Sport Partnerships enable the development of one plan for a region, which will assist partnership working and the ability to lever in additional funds, as well as the ability to remain focused on the local level, in terms of

engaging local communities and people and targeting investment creatively to provide the right delivery of services. In addition, they provide the opportunity to align resources and thus enhance funding, as well as the opportunity to take greater ownership of National Lottery funding.

KF6. Ultimately, Sport Wales stated Regional Sport Partnerships bring the opportunity to boost activity and increase participation. Members heard the need for this has been compounded by the impact of the covid pandemic.

KF7. The process of establishing Regional Sport Partnerships has commenced. Sport North Wales is live, with work advanced in Dyfed, Powys, and Gwent. In the Central South area, an Expression of Interest has been submitted by a loose consortium of all five local authorities, the Police and Crime Commissioner, the two local health boards and Cardiff Metropolitan University, with the latter as the lead organisation. The Expression of Interest is non-binding.

KF8. Other witnesses to the Inquiry did not articulate many of the benefits detailed above but agreed, when prompted by Members, that the partnerships would enable partners to share and learn from one another, albeit that some witnesses questioned whether a whole new entity is required to achieve this.

### **Concerns about Regional Sport Partnerships**

KF9. The Inquiry found that there was recognition amongst witnesses of the need for change, with sport in Wales facing decreased resources due to reductions in overall government funding. However, the Inquiry also found several concerns about the proposed Regional Sport Partnerships. These concerns centred on the overall model, implementation process and the potential impact of regional sport partnerships.

### **Overall Model – governance and footprint**

KF10. Regarding the overall model, the Inquiry found concerns about governance and the proposed regional footprint. Sport Wales has deliberately not provided a governance framework to enable partnerships to self-determine the best structure for their area. However, the Inquiry found that the lack of a governance framework is anxiety-inducing for participants. Members are not convinced this is a workable approach for every area in

Wales, particularly an area such as Central South that has numerous contributors to the Regional Sport Partnership. Therefore, **this Inquiry concludes more guidance from Sport Wales is required to assist partners determine the best governance arrangements.**

KF11. The Inquiry also heard concerns regarding decision-making in Regional Sports Partnerships being based on one equal vote, which could result in funding moving from some of the most deprived communities in Cardiff if other members of the partnership prioritised other needs. **To avoid this, this Inquiry concludes it makes sense for decision making to recognise the populations of the areas involved and to ratio votes accordingly.**

KF12. Regarding the regional footprint, concerns expressed included that the area covered is too large and too diverse to work cohesively in one partnership. Central South covers an area where circa 1 million people live, which witnesses are concerned makes it too large to deliver appropriately targeted local programmes of community sport, needed to boost engagement and participation. In addition, the five local authority areas are diverse, with differing challenges and barriers facing their populations in becoming active and engaged in community sport. Concerns were expressed to the Inquiry that the Regional Sports Partnership may find it difficult to allocate reducing resources to equally valid but different priorities. **This could result in communities in Cardiff receiving a reduced service compared to current provision, with reduced engagement and participation, the direct opposite of the cited aims of regional sport partnerships.**

KF13. Sport Wales clarified that they would hold regional partners to account to ensure citizens needs are fairly met, using a range of data to ensure this. Sport Wales added that they see Regional Sport Partnerships as an opportunity for Cardiff to lead on BAME work and bring their insight, knowledge, and local intelligence to bear. They also highlighted that work in the early adopter, Sport North Wales, showed the need to have evidence-based discussions regarding specific needs and to work across the partnership to build commitment to meeting these needs.

KF14. The Inquiry also heard concerns that the partnership would prove unworkable as it covers two local health board areas and cuts across the existing sports landscape. The local health boards have different priorities and approaches, based on meeting the diverse

needs of their populations, meaning Central South would need to develop two, separate plans, which would create a divide. Sport Wales confirmed that Central South has raised the issue of how to coordinate across the two Health Board areas and that they are aware of views that it would be better to adapt the regional model, perhaps splitting it into two based on the Health Board areas. They highlighted there is also the option of creating sub-partnerships within the overall partnership.

KF15. Regarding the existing sporting landscape, the Inquiry heard that community sports provision benefits from relationships formed with elite sporting clubs in a local area. The proposed Central South Regional Sport Partnership cuts across some of the areas covered by elite sporting clubs, which may make it more complex to manage the interface between elite and community sport, to the detriment of provision.

KF16. Having considered the above concerns and Sport Wales's response, **the Inquiry concludes that, in an environment of reducing resources, it will be difficult to balance priorities across such a diverse region, as all are valid priorities with strong evidence bases.** This view is borne out by the differing agendas adopted by the two health boards that aim to meet the health and wellbeing needs of their populations. **Members therefore have a real concern that there will be a dilution of what we currently do in Cardiff, which cannot be allowed to happen, for the individuals this will affect, their communities, the overall wellbeing of Cardiff and the knock-on costs to public services, such as health, if preventative measures such as community sports are reduced.**

KF17. The Inquiry finds that the concerns about the proposed model and footprint are a real block in moving forward with the Central South Regional Sport Partnership. It is clear that there is an unwillingness to commit to a Partnership with the current regional footprint. These points, plus the fact that community sport provision will be further impacted by the fact the footprint stretches across existing networks between elite and community sport provision, means that **this Inquiry concludes it would be best to not adopt the regional model but, if we must, then it is advisable to adapt the regional model.**

KF18. The Inquiry heard evidence that Sport Wales recognises there is ongoing debate regarding regional footprints, and that the original Dyfed Powys area has been split following concerns expressed by participants. The Inquiry believes it should be possible

for Sport Wales to do the same for Central South area as they have for Dyfed Powys, which would result in seven Regional Sport Partnerships across Wales, still enabling economies of scale to be realised.

### Implementation Process

KF19. The Inquiry heard concerns from witnesses about the lack of political oversight and input into the implementation of the Central South Regional Sport Partnership as well as concerns about the lack of a clear timeline for implementation.

KF20. The Inquiry finds there has been a lack of engagement with Cardiff Council's Cabinet Members to discuss the proposed approach and the specifics about the Central South Regional Sports Partnership. Sport Wales set out that their role is to discuss and explore constructive ways forward and clarified that they are happy to talk to Cabinet Members and local members, in a collaborative manner, alongside officers. They stated they have met with Cabinet Members in other parts of Wales, where regional sport partnerships have not been an issue politically.

KF21. The Inquiry found that there was a feeling that Sport Wales did not understand the local authority landscape in the Central South area, which is more elected member-led than other local authority areas.

KF22. Sport Wales highlighted that, in their view, the lack of political mandate is the key stumbling block, and that they are keen to work with partners to address this. **Members agree that political input is key and are pleased to hear Sport Wales's openness to meeting with Cabinet Members in a constructive manner;** it can only be to everyone's benefit to build positive relationships.

KF23. Regarding the timeline for the introduction of Regional Sport Partnerships, the Inquiry heard that the original timeline for establishing a regional partnership has slipped, due to the covid pandemic. Some witnesses were now not clear on the timeline. Sport Wales clarified that they do not want to force a timeline. However, those not in a regional sport partnership will fall behind in terms of delivering against the Well Being of Future Generations Act agenda. Therefore, whilst there is not a fixed timeline, there is an end of the road.

KF24. Members asked what would happen if we reached the end of the road but there is no agreement. Sport Wales explained it is not looking to divert Central South funding elsewhere as the funding is for the citizens living in the region. Sport Wales would make sure a structure is in place to deliver for those citizens. This Inquiry **concludes it would be helpful to have an agreed timeline, to provide impetus for solution-finding.**

#### **Potential Impact**

KF25. This Inquiry heard concerns regarding the potential impact of a regional sport partnership, in terms of reduction in resources and a reduction in local partnership working and community intelligence.

KF26. The Inquiry heard the introduction of regional sport partnerships could result in national, regional, and local authority bodies reducing resources in sport, by cutting officer posts and reducing in-kind contributions. In addition, concerns were expressed that a regional sport partnership may not get the same value for money invested regionally as is currently achieved, due to lower levels of local partnership working and community intelligence. Finally, concerns were expressed that monies may be diverted from Cardiff, despite high levels of need.

KF27. The Inquiry explored these concerns with Sport Wales, which was clear that they are seeking to protect frontline budgets in partner organisations, including local authorities, and protect the delivery of community sport provision in a time of reducing resources, by better coordinating existing resources. They stated that they had made the difficult choice to reduce their own staffing base to reduce their take of the overall resource level, to protect resource for use elsewhere. Sport Wales were explicit that regional sport partnerships are not about threatening sports development teams in local authorities; they see these as key in providing the insight and intelligence that the regional sport partnership will need to properly direct resource. In addition, Sport Wales confirmed that local authorities and partners in Sport North Wales are making in-kind contributions.

KF28. Regarding local partnership working and community intelligence, the Inquiry heard how important it is to have local knowledge about what will work in different communities. Concerns were expressed that if the regional sports partnership model led to a reduction in sports officer posts, this would result in a loss of community intelligence and partnership knowledge. In addition, staff changes, and a regional way of working, would negatively

impact local partnership working. Finally, a regional sports partnership would not be involved in Major Events in the same way local authorities are and therefore would struggle to lever in the additional community sport outreach that the local authority is able to as part of the process of planning the hosting of Major Events.

### **Where Cardiff is now**

KF29. In 2014, Cardiff Council and Cardiff Metropolitan University established a Joint Venture, Sport Cardiff, to deliver community sport services in the city. Cardiff Council staff were transferred into the Sport Cardiff team. The existing approach to community sport in Cardiff works well, with targeted work to boost participation rates for key sectors of the population, cross boundary working, partnership working with sports clubs and governing bodies and the development of a pool of over 400 volunteers to assist at major sporting events.

KF30. Sport Cardiff work with Cardiff Council and a range of partners to develop an annual Local Sports Plan, which delivers the priorities and key considerations above and is agreed annually with Sport Wales and links to their core National Programmes. Sport Wales part-fund Sport Cardiff, based on delivery of the outcomes set out in the Local Sport Plan, and have been complimentary about the work happening in Cardiff, as documented in annual reports.

KF31. The local authority role in Community Sport is important, with successive administrations having worked to build relationships with sport communities in Cardiff. This allows Cardiff Council to maximise the benefits of these relationships, for example by increasing the delivery of community sport linked to Major Events, such as providing rugby outreach in Llanrumney, Adamsdown, Riverside and Ely as part of the Urdd Rugby 7's.

### **Where Next?**

KF32. Concerns were expressed that the combination of all the issues highlighted above would result in Cardiff being especially affected, with a decline in community sports overall and for the most deprived communities in particular. Some witnesses felt this to be particularly unfair given that the current Joint Venture partnership is working well in addressing participation and activity rates. There was a feeling amongst several witnesses that Cardiff would be disadvantaged because of issues elsewhere in Wales.



KF33. From the perspective of Cardiff, there is particular concern that the proposed footprint will do harm to Cardiff. However, Members also heard that, from the perspective of other areas, they are concerned that Cardiff will ‘take-over’ and that the needs of their areas will be overshadowed by the levels of need in Cardiff. The Inquiry was struck by the fact that, whilst the current incumbents at Sport Wales are clear they would not let this happen, there could be staff changes at Sport Wales and therefore this position could alter. Uncertainty around the governance framework and decision-making compound these concerns.

KF34. The Inquiry asked witnesses for any alternative ideas for the reorganisation of community sport provision, given the landscape of reducing resources and the need to boost engagement and participation rates. The following suggestions were received:

- a. Cardiff-only footprint
- b. Cardiff and Vale of Glamorgan footprint
- c. Joint Venture model
- d. ‘As-Is’ Plus.

KF35. The Inquiry notes these responses would lead to many of the benefits of the proposed Central South regional sports partnership without as many disadvantages.

### **How to prepare**

KF36. The Inquiry identified the following key steps in preparing for Regional Sport Partnership:

- a. Record accurate data re participation rates
- b. Adopt ‘Whole Community’ System Thinking
- c. Join up conversations across the sector
- d. Avoid parochialism
- e. Build trust and commitment.

KF37. Sport Wales stated that partners need to own and develop the partnership, to help shape, grow and nurture the partnership. They believe there is a clear role for local authorities in this process; it is not Sport Wales’s role to lead the partnership. The Inquiry understand the need for partnerships to find their own momentum. However, **Members believe there is a role for Sport Wales to assist in the establishment of a partnership, particularly when it is clear there are issues with this.**

## Lessons from Sport North Wales

KF38. Sport North Wales includes six local authorities, Public Health Wales, Betsi Cadwaladr University Health Board, Glyndwr University, Bangor University, North Wales Housing Associating (including six local housing associations), North Wales Education Consortia, and Disability Sport Wales. It is connecting with organisations such as the North Wales Regional Equality Network. It is likely the Sports Partnership will connect with other regional bodies such as, for example, the North Wales Economic Ambition Board and the office of North Wales Police and Crime Commissioner.

KF39. The local authorities played an active role in its formation, with one of the Chief Executives leading the project. A Collaboration Board met monthly to build trust and commitment, and a Regional Planning Group developed the strategic plan and is now working on implementation of the regional delivery plan as well as having the ability to horizon-scan for future risks, opportunities, and regional need.

KF40. The Sport North Wales governance model has been developed to meet the requirements of the Governance and Leadership Framework and Sport Wales Capability Framework and was self-determined by the partnership members following a detailed review and options appraisal.

KF41. The Sport North Wales Partnership Board is skills based, led by a Chair who was externally recruited. They have appointed a Regional Director and other paid officers.

KF42. The amount of Sport Wales funding for Sport North Wales has not changed from the amount that used to go to the local authorities. However, the partnership identified additional resource to move forward proactively in addition to their individual commitments and leadership roles and are making in-kind contributions where needed. In addition, the partnership has already attracted additional funding through its partnership with Public Health Wales and are actively connecting with 'Get North Wales Moving'. Sport North Wales also plan to explore commercial and other revenue stream partnerships moving forward.

KF43. Sport North Wales has begun conversations about how to re-allocate funding based on need, with future programming to be evidence led, supported by regional insight.

KF44. Sport Wales clarified that a learning log approach has been taken throughout the early adopter phase. Key lessons to date include:

- a. Early identification of purpose and role is very important – this is up to the partnership to determine, not Sport Wales – need to enable partners to come together and establish this
- b. People and partnerships - need to recognise these are already busy and committed and give them time and space to operate and be comfortable with what they are doing – Sport Wales can offer some small resource to help this process
- c. Partnership leads, Sport Wales offer support
- d. Up to regional partnership to identify best way to corral partners to meet needs of region – does mean there will be some difficult conversations, but Sport North Wales has managed to do this
- e. Building trust and commitment is key
- f. Funding – has been able to draw in funding that might not otherwise have done.

KF45. The work to develop Sport North Wales commenced 5-6 years ago, with Sport North Wales becoming operational 6-8 months ago and so it is too early to know its impact. However, the Inquiry was surprised to find that no reports have been produced on the process of establishing the partnership and emerging lessons that could be useful for other partnerships. Members feel it would be useful to understand and share the lessons from Sport North Wales, notwithstanding that there will be differences between the areas in terms of demographics, need, and engagement and participation rates, as it is more the lessons on building a successful partnership and implementing the new approach that will of value.

## RECOMMENDATIONS

Having considered the evidence to this Inquiry, as well as our knowledge of community sport services in Cardiff via our other scrutinies and our ward work, Members are not convinced the current proposals from Sport Wales are in the best interests of Cardiff and our deprived communities. Therefore, the Economy & Culture Scrutiny Committee makes the following recommendation.

*R1. Cabinet urgently pursues with Sport Wales the feasibility of maintaining our current existing Joint Venture partnership with Cardiff Metropolitan University rather than entering a Regional Sport Partnership.*

In the event discussions with Sport Wales on the above recommendation prove fruitless, the Economy & Culture Scrutiny Committee makes the following recommendations:

*R2. Cabinet takes up Sport Wales's offer to engage to:*

- a. enable political input and to build political mandate*
- b. Lobby for a reduced footprint, either Cardiff-only or one based on the Cardiff & Vale University Health Board footprint*
- c. Work collaboratively to achieve agreement on reduced footprint as set out above.*

*R3. Cabinet actively engages with the Regional Sport Partnership development process to build trust and commitment.*

*R4. Cabinet works collaboratively with Regional Sport Partnership partners to agree governance arrangements that ensure Cardiff's voice is heard in proportion to population size.*

*R5. Cabinet seeks assurance from Sport Wales that priorities identified for Cardiff will not be diluted in any regional partnership and funding will not be diluted.*

*R6. Cabinet seeks clarification from Sport Wales on their basic expectations regarding governance models.*

## CURRENT PROVISION OF COMMUNITY SPORT

1. In 2014, Cardiff Council and Cardiff Metropolitan University established a Joint Venture, Sport Cardiff, to deliver sport services in the city. Cardiff Council staff were transferred into the Sport Cardiff team.
  
2. The Joint Venture set out the following priority objectives:
  - **Regional Sports Boards**<sup>1</sup>: “Provide a regional delivery mechanism for the Local Sports Plan”
  - **Sport for Children**: “Provide every young person in Cardiff access to quality sporting opportunities” “Every Child a Swimmer”
  - **Strong and Vibrant Clubs**: “Cardiff will provide the opportunity for a variety of community-based sports clubs to become visible and viable in order to thrive through the cities excellent infrastructure”
  - **Coaching, Volunteering and Workforce**: “Create a highly skilled workforce to service the needs of Cardiff’s sporting community”
  - **Competitions/Cardiff Games**: “To provide the opportunity for every young person in Cardiff to experience high quality appropriate competition”
  
3. Underpinning each priority objective are the following key considerations:
  - BME
  - Women & Girls
  - Disability Sport and Inclusive Opportunities
  - Disadvantaged areas.
  
4. Sport Cardiff work with Cardiff Council and a range of partners to develop an annual Local Sports Plan, which delivers the priorities and key considerations above and is agreed annually with Sport Wales and links to their core National Programmes.

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<sup>1</sup> Established for each Neighbourhood Partnership area

5. Sport Wales part- fund Sport Cardiff<sup>2</sup> by way of an annual grant circa £600,000, to deliver outcomes based on the annually agreed ‘Local Sport Plan’. Sport Wales is complimentary about the work happening in Cardiff, as documented in annual reports.
6. This Inquiry heard that the existing approach to community sport in Cardiff works well, with:
  - targeted work to boost participation rates for key sectors of the population
  - cross-boundary working to create critical mass needed to deliver key projects to smaller population groups
  - partnership working with sports clubs and governing bodies to boost outreach work
  - 400+ volunteers available to assist at major sporting events.
7. This Inquiry heard that the local authority role in Community Sport is important, with successive administrations having worked to build relationships with sport communities in Cardiff. This allows Cardiff Council to maximise the benefits of these relationships, for example by increasing the delivery of community sport linked to Major Events, such as providing rugby outreach in Llanrumney, Adamsdown, Riverside and Ely as part of the Urdd Rugby 7’s.

## ROLE OF SPORT WALES RE COMMUNITY SPORT

8. Sport Wales is the national organisation that works on behalf of Welsh Government to develop and promote sports and physical activity programmes in Wales. It uses Welsh Government funding and National Lottery funding to support community sports.
9. Funding is available to individuals and clubs, for equipment, coaching, costs associated with establishing a new club and volunteer schemes. There are various grant schemes, including in the past, Community Chest grants, Development Grants and A Place for Sport grants. Current community level grant schemes include:
  - a. **CrowdFunder – A Place for Sport** – up to £15,000 to improve ‘off-field’ community sport facilities, such as changing rooms, storage, ramps etc.

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<sup>2</sup> The other main funders of Sport Cardiff are Cardiff Met, Cardiff Council, Cardiff & Vale UHB, South Wales Police Trust Fund and Disability Sport Wales

- b. **Be Active Wales Fund** – £4million fund to increase participation on-field, aiming to '*protect and progress community sport clubs and organisations in Wales through the Covid-19 pandemic and into the future.*'

10. The Welsh Government sends Sport Wales an annual remit letter that confirms the amount of funding being provided and sets out the priorities and targets that Sport Wales should focus on that year. In 2018-19, the annual remit letter from the Minister for Culture, Tourism and Sport, Dafydd Elis-Thomas AC/AM, stressed the need for Sport Wales to maximise its contribution to achieving the goals of the Wellbeing of Future Generations Act 2015 and to develop a Corporate Plan for 2018-2021 that led to the following outcomes:

**Outcomes**

- More people meeting the Chief Medical Officers physical activity guidelines
- More people undertake sport and physical recreation on 3 or more occasions per week.
- An increase in sport and physical recreation participation by those most in need or disadvantaged.
- A system that delivers continuous elite sport success while ensuring the safety, well-being and welfare of all sportsmen and sportswomen.

## LEVELS OF PHYSICAL ACTIVITY IN WALES

11. Sport Wales clearly articulated to the Inquiry the need for improved participation rates pan-Wales. Their evidence included the following:
- *There are 1.4 million people who are regularly active, but we also know that if you have a disability, live in poverty or are from a BME background you are less likely to be active or enjoy sport – longstanding challenges that we have to address if we are to get everyone active through sport*
  - *We need to consider the needs and motivations of individuals and be responsive to their changing needs; we need to be able to engage with all young people and give them a positive start, developing habits for a lifetime of activity. Ultimately, we need to showcase the benefits of sport to wider audiences, bringing new partners and investment to the start line.<sup>3</sup>*
  - *Those participating less frequently than 3x per week*

<sup>3</sup> Information Memorandum (2019)

- *Around half of young people from an ethnically diverse group*
  - *More than half of all young people with a disability*
  - *Almost 6 in 10 young people from the most deprived communities*
  - *Over half of all girls.*
12. Sport Wales made the point that the covid pandemic will have compounded these issues. Their evidence found 96% of children and young people said they would like to do more sport, highlighting the latent demand for certain activities. Therefore, there is a need to ensure the right support and opportunities are available and that barriers are removed.
13. Sport Wales explained why it is important to boost levels of physical activity and sport in Wales, not only to promote physical and mental health and wellbeing but to promote community cohesion, skills development, and lifelong learning. They also explained how community sport can help tackle anti-social behaviour and crime. Members of the Inquiry concur with these points, noting that Cardiff Council has long held these views and acted to boost community sport accordingly.

## REGIONAL SPORTS PARTNERSHIPS

14. In response to the direction of Welsh Government to refocus efforts to maximise its contribution to the goals of the Wellbeing of Future Generations Act, Sport Wales undertook comprehensive engagement to inform its new Vision for Sport, culminating in a vision of creating *'An Active Nation Where Everyone Can Have a Lifelong Enjoyment of Sport'*.
15. To deliver this vision, Sport Wales looked at regional sports partnership models used in England, Scotland, and New Zealand. Rather than adopt these wholesale, Sport Wales has modified the approach to one they believe is best suited for Wales, for example having a less prescriptive approach and a wider scope than the model followed in Scotland.
16. Sport Wales developed a new approach called *'Community Sport and Activity Programme'*, based on Regional Sport Partnerships. Regional Sport Partnerships are the mechanism through which Sport Wales will direct its funding of community sport in a



long-term approach (most likely through a 5–10-year partnership). Sport Wales estimated that resource per Sport Partnership will be circa £12million over 5 years.

Funding will be made up of:

- Funding focussing on extra-curricular school sport and the development of physically literate young people
- Funding for the Free-Swimming Initiative
- Lottery Grant schemes
  - Plus
- Funding to support leadership, strategy development, insight & operational running of the partnership
- a commissioning budget to incentivise match funding and develop new and innovative opportunities to be physically active through sport.

17. In 2019, Sport Wales shared an Information Memorandum, with partners, which set out:
- a. Rationale for new approach
  - b. Information on proposed approach
  - c. Detail on Regional Sport Partnership areas and outcomes to be achieved
  - d. Commissioning process
    - How to be involved
    - How to submit an Expression of Interest
    - Outline details of next stages.

### **Rationale for Regional Sports Partnerships**

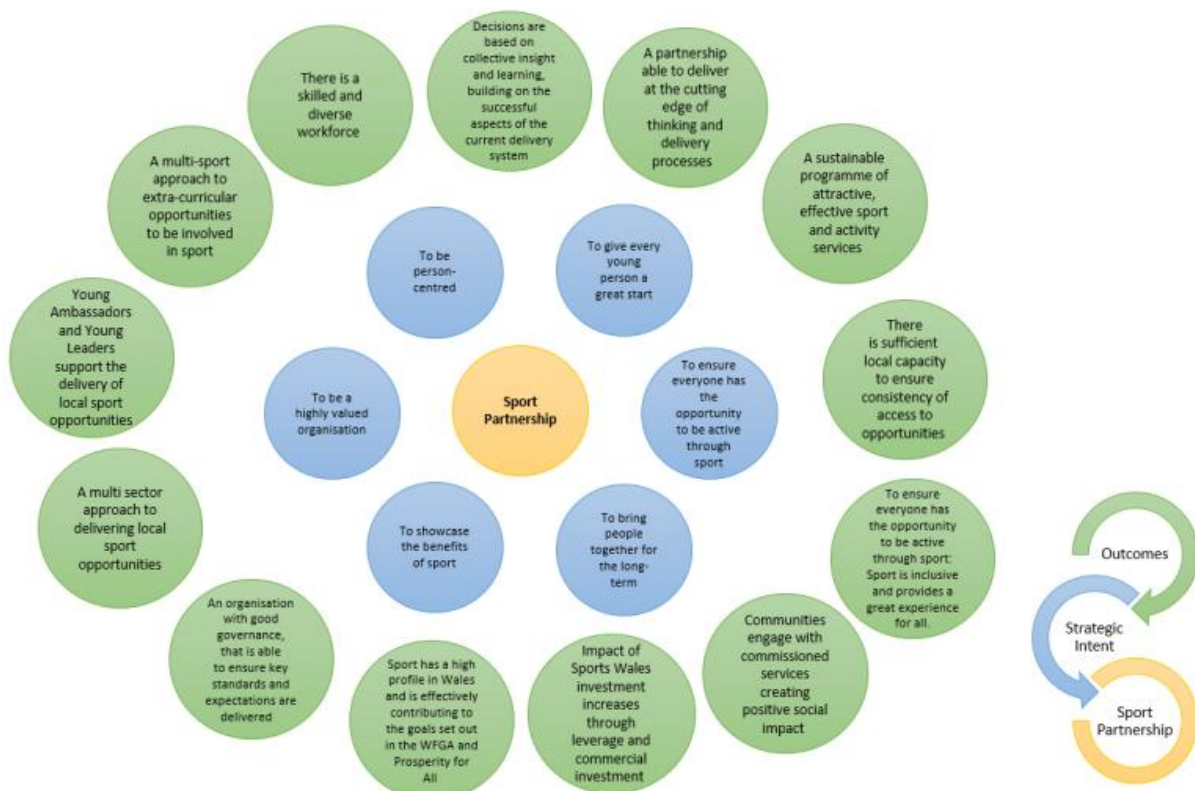
18. Sport Wales stated that the current ways of working, pan-Wales, are not sufficient to deliver the change required by Welsh Government, in terms of boosting participation rates in physical activity and sport. In their evidence to this Inquiry, they cited the World Health Organisation's recent statement that organisations need to come together in strong partnerships to affect change. Sport Wales stated that Regional Sport Partnerships can deliver the scale of change required in Wales.
19. The Inquiry were interested to understand why Sport Wales believed Regional Sports Partnerships were necessary to deliver increased participation rates in physical activity and sport, as opposed to other possible approaches. Sport Wales stated that their view

is that a fresh, collective approach is needed to achieve the vision, to build on the successful aspects of current approaches to community sport and activity to ensure everyone can participate and benefit from a lifelong enjoyment of sport. Sport Wales gave the following specific benefits for having regional sports partnerships:

- Collaborative approach – involve partners and sectors and be able to speak with one voice to other organisations, for example Education Consortia
- Insight-led approach – clear evidence that will meet local needs
- Collective learning – help boost profile of successful projects and sport overall
- Asset based approach – current approaches mean great work not always joined up or shared. Sport Wales clear that do not want to deconstruct good work but build on it.
- Boost profile and show added value of sport – ensure sport has a place in local decision making and local partnerships.

20. The Inquiry notes that many of these ways of working are already in place in Cardiff, via Sport Cardiff and the collaborative, partnership, evidence-based ways in which it works.

21. The aimed for outcomes for Regional Sports Partnerships are set out in the graphic below, taken from Sport Wales Information Memorandum document:



22. The Information Memorandum set out a proposed two-fold role for Regional Sport Partnerships, which also details benefits:
- a. The power of the collective to strategically plan and lead this work, developing one vision, one plan which is developed and owned by all.
    - o Use of insight – a strong evidenced based plan that meets the needs of participants and stakeholders.
    - o Targeted Investment - creating the conditions for innovation in service delivery and being able to evidence the impact being made
    - o Leveraging in additional resources (whether funding, people, value in kind) to support the delivery of the outcomes
  - b. Provision of high-quality local opportunities to be active through sport – more opportunities, delivered locally. At a local level it means:
    - o Listening to local communities and local people
    - o Putting their needs first and delivering high quality opportunities to be active at the right time, right place and in the right environment
    - o ENJOYMENT is central to people getting involved
    - o Providing the right delivery for those tens of thousands of people who want to do more.
23. Other witnesses to the Inquiry did not articulate many of the benefits detailed in points 19-22 but agreed, when prompted by Members, that the partnerships would enable partners to share and learn from one another, albeit that some witnesses questioned whether a whole new entity is required to achieve this.
24. Members note this lack of iteration of strengths of regional sports partnerships by other witnesses. Members' view is that Cardiff already benefits from many of the strengths detailed above, due to its Joint Venture with Cardiff Metropolitan University and the resultant strengthened partnership working and improved participation rates. Members recognise that, theoretically, there could be benefits to other areas in Wales and potentially in the Central South area but do not have the information to comment fully on this.

25. This Inquiry also sought to understand the opportunities arising from Regional Sports Partnerships. Sport Wales identified the following:
- a. Opportunity to boost activity and increase participation
  - b. Opportunity to take greater ownership of National Lottery funding element
  - c. Opportunity to align resources and enhance funding received by joining up planning and coordination.
26. The Inquiry heard that Sport Wales undertook business case analyses that resulted in proposals to split Wales into five regions. Sport Wales propose Cardiff is part of a Central South Regional Sport Partnership consisting also of the following local authorities: Vale of Glamorgan, Merthyr, Rhondda Cynon Taf, and Bridgend.
27. The commissioning process for Regional Sports Partnerships consists of 3 stages:
- a. Expressions of Interest – to be a lead organisation or delivery partner
  - b. Outline Solutions Stage
  - c. Full Business Case
28. The process of establishing Regional Sports Partnerships has commenced, with Expressions of Interest sought. An Expression of Interest has been submitted for the Central South area, by a loose consortium of all five local authorities, the Police and Crime Commissioner, the two local health boards and Cardiff Metropolitan University, with the latter as the lead organisation. The Expression of Interest is non-binding.
29. This Inquiry heard that Cardiff Metropolitan University put itself forward as the Lead Organisation for the following reasons:
- Pragmatism – Regional Sports Partnerships are going to happen; therefore, they would prefer to play a proactive role to shape and steer this
  - No vested role – and so able to bring partners together across the region
  - Need to shape future and be seen as trusted partner
  - Can help to ensure Cardiff gets best out of opportunity.

## CONCERNS HIGHLIGHTED

30. The Inquiry found that there was recognition amongst witnesses of the need for change, with sport in Wales facing decreased resources, due to reductions in overall government funding. However, the Inquiry also found several concerns about the proposed Regional Sports Partnership approach and possible impact. These concerns centred on:
- a. Overall Model
    - Governance
    - Regional Footprint
  - b. Implementation
    - Political input
    - Timeline
  - c. Potential Impact
    - Reduction in resources
    - Reduction in local partnership working and community intelligence
31. Some of the witnesses concluded that the combination of the above would cause an inequitable impact on Cardiff and its communities. These concerns are detailed below.

### Concerns expressed re overall model

32. The Inquiry heard evidence that the Regional Sports Partnership approaches in England and Scotland had not worked as expected, with Scotland ceasing to operate a regional model and some areas of England moving away from this approach, for example Manchester now has a stand-alone sports partnership, rather than being part of the Greater Manchester partnership. Concerns were expressed that Wales was therefore following a model that had proved to be ineffective elsewhere.
33. Members put these points to Sport Wales, which clarified that they had deliberately learnt lessons from the approaches taken elsewhere and modified the model for Wales accordingly. For example, the approach taken in Scotland differed significantly to the approach proposed in Wales, in that it was more prescriptive regarding governance and staffing arrangements, with a narrower scope. Sport Wales offered to speak with sportscotland to ascertain their views on regional sports partnerships; they informed the

Inquiry sportscotland remained supportive of the principles behind more effective collaboration at a regional level.

## **Governance**

34. The Inquiry heard concerns expressed that there was a lack of clarity from Sport Wales regarding governance arrangements. Some witnesses stated Sport Wales informed them it was up to the partnership to determine governance arrangements, and they did not feel this was helpful.
35. Sport Wales informed the Inquiry that they do not think it best to prescribe a specific approach, other than to comply with good governance<sup>4</sup>, and that it is better for partnerships to develop a governance approach that meets the needs of their areas. Sport Wales want to encourage self-determination of governance and are content if regional partnerships look different to one another – it is up to the regional partnership to determine what works best for them.
36. Whilst Members think Sport Wales's aims are laudable, Members understand why a lack of governance framework is anxiety-inducing and are not convinced this is a workable approach for every area in Wales, particularly an area such as Central South that has numerous contributors to the regional sports partnership.
37. The Inquiry also heard concerns specifically regarding decision-making in Regional Sports Partnerships. Concerns were expressed that, if each member of the partnership had one equal vote, communities in Cardiff would be negatively affected as other areas of the partnership may not have the same needs as communities in Cardiff and therefore may not vote to approve release of funding to meet these needs, as they may wish the funding to be used for priority needs in their areas. This concern is explored in more detail later in this report, at points 43-44.
38. To avoid this, Members believe it makes sense for decision making to recognise the populations of the areas involved and to ratio votes accordingly.

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<sup>4</sup> Governance and Leadership Framework and Sport Wales Capability Framework.

### **Regional Footprint**

39. The proposed Central South Regional Sport Partnership covers five local authority areas – Bridgend, Cardiff, Merthyr, Rhondda Cynon Taf, and the Vale of Glamorgan – and two local health boards – Cardiff & Vale UHB and Cwm Taf Morgannwg Health Board.
40. Concerns were expressed to the Inquiry that the area covered is too large and too diverse to work cohesively in one partnership. Members also heard concerns that the partnership would prove unworkable as it covers two local health board areas and cuts across the existing sports landscape. More details on these are set out below.

### **Size of Footprint**

41. The proposed Central South Regional Partnership covers an area where circa 1 million people live. Witnesses were concerned that the scale of this makes it too large to deliver appropriately targeted local programmes of community sport, which are needed to boost engagement and participation.

### **Diversity of areas**

42. In addition, Members heard that the five local authority areas are diverse, with differing challenges and barriers facing their populations in becoming active and engaged in community sport. For example, the valley communities have high rates of long-term limiting health conditions and underlying health conditions that affect mobility, coupled with an older population structure, and high levels of poverty and deprivation. These also exist in Cardiff, which in addition has a higher level, compared to the valleys, of BAME communities living in deprived areas.
43. Concerns were expressed to the Inquiry that the Regional Sports Partnership may find it difficult to allocate reducing resources to equally valid but different priorities. One example given to the Inquiry was that currently there are specific projects in Cardiff to improve engagement and participation amongst BAME communities in community sport. However, witnesses are not convinced the Regional Sports Partnership will prioritise these given the other priority needs within its area. Witnesses are therefore concerned that communities in Cardiff will receive a worse offer because of the introduction of a Regional Sport Partnership and that the aims of Welsh Government, in terms of

improving engagement and participation amongst deprived communities, will not take place in some of the most deprived communities in Cardiff.

44. Members put these points to Sport Wales, who recognised these concerns and clarified that they will hold regional partners to account to ensure citizens needs are fairly met, using a range of data to ensure this. Sport Wales added that they see Regional Sport Partnerships as an opportunity for Cardiff to lead on BAME work and bring their insight, knowledge, and local intelligence to bear. They also highlighted that work in the early adopter, Sport North Wales, showed the need to have evidence-based discussions regarding specific needs and to work across the partnership to build commitment to meeting these needs.

#### **Two Health Boards**

45. The area covered by Central South includes two local health boards, which have different priorities and approaches, based on meeting the diverse needs of their populations. The Inquiry heard that this means the Central South Regional Sport Partnership would need to develop two, separate plans, which would create a divide.
46. Sport Wales confirmed to the Inquiry that the Central South Regional Sport Partnership has raised the issue of how to coordinate across the two Health Board areas and that they are aware of views that it would be better to adapt the regional model, perhaps splitting it into two based on the Health Board areas. They highlighted there is also the option of creating sub-partnerships within the overall partnership.

#### **Existing Sports Landscape**

47. The Inquiry heard that community sports provision benefits from relationships formed with elite sporting clubs in a local area. The proposed Central South Regional Sports Partnership cuts across some of the areas covered by elite sporting clubs, which may make it more complex to manage the interface between elite and community sport, to the detriment of provision. One example cited to the Inquiry was Rugby, with Bridgend being linked to the Ospreys and Cardiff, Rhondda Cynon Taf, and the Vale of Glamorgan being linked to Cardiff Blues.



48. The Inquiry notes these concerns and Sport Wales's responses to these and concludes that, in an environment of reducing resources, it will be difficult to balance priorities across such a diverse region, as all are valid priorities with strong evidence bases. This view is borne out by the differing agendas adopted by the two health boards, that aim to meet the health and wellbeing needs of their populations.
49. Members therefore have a real concern that there will be a dilution of what we currently do in Cardiff, which cannot be allowed to happen, for the individuals this will affect, their communities, the overall wellbeing of Cardiff and the knock-on costs to public services, such as health, if preventative measures such as community sports are reduced.
50. These points, plus the fact that community sport provision will be further impacted by the fact the footprint stretches across existing networks between elite and community sport provision, means that this Inquiry concludes it would be advisable to adapt the regional model.

### **Changing the regional footprint**

51. Members note the Information Memorandum<sup>5</sup> references that there will be further discussions on the make-up of the regions, with Sport Wales committed to '*ongoing dialogue and support for all partners engaging in the process ...to support them in working through modelling that will address their concerns*'. The Information Memorandum also states it is recognised that '*there is still some debate in the sector about the best make-up of the Sport Partnership (in terms of geography)*' and that the process is designed to enable organisations to continue to discuss and agree the most appropriate approach, through the outline solution stage, with organisations able to present and discuss alternative arrangements. Members heard that Sport Wales has agreed to split the original Dyfed Powys area, following concerns expressed by participants in those areas that the footprint was too big.

### **Conclusions**

52. Members recognise that the concerns about the proposed model and footprint are a real block in moving forward with the Central South Regional Sport Partnership. It is clear to

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<sup>5</sup> Getting People in Wales Active for Life: Information Memorandum – Sport Wales 2019

Members that there is an unwillingness to commit to a Partnership with the current regional footprint. From the perspective of Cardiff, this is because the footprint is seen as doing harm to Cardiff. However, Members also heard that, from the perspective of other areas, they are concerned that Cardiff will ‘take-over’ and that the needs of their areas will be overshadowed by the levels of need in Cardiff. Uncertainty around the governance framework and decision-making compound these concerns.

53. Members conclude that the proposed footprint is too large. Members believe it should be possible for Sport Wales to do the same for Central South area as they have for Dyfed Powys, which would result in seven Regional Sport Partnerships across Wales, still enabling economies of scale to be realised.

### **Concerns expressed re implementation**

54. The Inquiry heard concerns from witnesses about the lack of political oversight and input into the implementation of the Central South Regional Sport Partnership as well as concerns about the lack of a clear timeline for implementation.

### **Political Oversight and Input**

55. Witnesses raised concerns about the lack of engagement by Sport Wales with local authority Cabinet Members to discuss the proposed approach and the specifics about the Central South Regional Sports Partnership. Members asked witnesses if they knew why Sport Wales was taking this approach and received various answers, including that Sport Wales did not see it as their role to persuade local Members of the case for Regional Sports Partnerships. There was a feeling that Sport Wales did not understand the local authority landscape in the Central South area, which is more elected member-led than other local authority areas.
56. The Inquiry raised these points with Sport Wales, which clarified that they are happy to talk to Cabinet Members and local members, in a collaborative manner, alongside officers. They stated that their role is to discuss and explore constructive ways forward and that it is local authority officers’ role to work with members as part of the regional sport partnership development process. They concluded that it is not Sport Wales role to convince politicians but to work with them to find solutions.

57. Sport Wales also highlighted that they have met with Cabinet Members in other parts of Wales as part of discussions on Regional Sport Partnerships. They added that in North Wales, regional partnerships had not been an issue politically and that in Dyfed & Powys there had been political engagement and it had helped shape how it is now. In Gwent, there has been some political engagement. They stated this shows Sport Wales is being flexible in its approach in order to get the project delivered.
58. Sport Wales highlighted to the Inquiry that, in their view, the lack of political mandate is the key stumbling block, and that they are keen to work with partners to address this. They added that hopefully this scrutiny will illustrate the benefits of the proposed changes.
59. Members agree that political input is key and believe that all involved should have worked together from the start to obtain buy-in to enable discussions to move forward on the best approach for the region. Members agree that local authorities in the Central South area are member-led and that elected members expect to be involved in discussions shaping regional partnerships. Members were pleased to hear Sport Wales's openness to meeting with Cabinet Members in a constructive manner; it can only be to everyone's benefit to build positive relationships.

### **Timeline**

60. The Inquiry hear that the original timeline for establishing a regional partnership has slipped, due to the covid pandemic. Some witnesses were now not clear on the timeline, whilst other witnesses believed the timeline to be March 2022 but were unsure whether this was fixed or could slip again.
61. Members sought advice from Sport Wales on the timeline. Sport Wales clarified that they do not want to force a timeline but want to get to a point where all are comfortable to move forward. However, they stated that the fact other sports partnerships are either already up and running or due to come online imminently, means those not in this position will fall behind in terms of delivering against the Well Being of Future Generations Act agenda. Therefore, whilst there is not a fixed timeline, there is an end of the road. Sport Wales funding flows from the Wellbeing of Future Generations (Wales)

Act 2015 and the Welsh Government's Programme for Government and Sport Wales needs to make inroads to delivering these so it cannot keep the structure as it is.

62. Members asked what would happen if we reached the end of the road but there is no agreement – would Sport Wales step in or would they divert funding support to others? Sport Wales clarified it is not looking to divert Central South funding elsewhere as the funding is for the citizens living in the region. Sport Wales would make sure a structure is in place to deliver for those citizens.
63. Members note the above and believe it would be helpful to have an agreed timeline, to provide impetus for solution-finding.

### **Concerns expressed re potential Impact**

64. This Inquiry heard concerns regarding the potential impact of a regional sport partnership, in terms of reduction in resources and a reduction in local partnership working and community intelligence. More details are provided below.

### **Reduction in Resources**

65. Witnesses to the Inquiry raised several concerns that the introduction of Regional Sport Partnerships would result in a reduction in resource levels for community sport per se as well as specifically for Cardiff.
66. An overarching concern was that the regional sport partnership model was being proposed as an efficiency-based model, a cost saving model, for Sport Wales, which has streamlined their resource base. Concerns were also expressed that local authorities may reduce their sports officer posts, as it will be harder to argue to keep posts in a climate of reducing local authority resources and high demand pressures, if there is a regional body. Some witnesses also expressed concern that, if a private sector operator was appointed as the lead organisation, this could lead to them using part of the regional sport partnership funding to meet core costs, such as HR, thus reducing the amount of funding available for community sport provision.
67. Members heard that the Central South area has already seen a reduction in resources for community sport, in that Disability Sport Wales announced changing their delivery

model to one officer in each region, rather than one officer in each local authority area. There are concerns other Wales-wide or region-wide organisations may follow suit, thus reducing the overall pool of resources for community sport.

68. In addition, concerns were expressed that a regional sport partnership may not get the same value for money invested regionally as is currently achieved for funding invested in Cardiff, particularly for BAME communities. This point links to the concern that regional sports partnerships will lead to lower levels of local partnership working and community intelligence, set out in more detail below. In essence, the concern is that there will no longer be the knowledge to understand the differences between communities and that services will be commissioned on too broad a basis, with poorer results, therefore.
69. Finally, concerns were expressed that monies may be diverted from Cardiff, despite high levels of need, due to the issues highlighted in points 37 and 43, and the perception that Cardiff receives a disproportionate amount for community sport.
70. Members explored these concerns with Sport Wales, which was clear that cost savings are not a driver for the introduction of regional sport partnerships and that they are seeking to protect frontline budgets in partner organisations, including local authorities, and protect the delivery of community sport provision in a time of reducing resources, by better coordinating existing resources. They stated that they had made the difficult choice to reduce their own staffing base to reduce their take of the overall resource level, so cost savings to Sport Wales has been a consequence of the introduction of regional sport partnerships but in order to protect resource for use elsewhere.
71. Sport Wales were explicit that regional sport partnerships are not about threatening sports development teams in local authorities; they see these as key in providing the insight and intelligence that the regional sport partnership will need to properly direct resource.
72. Regarding private sector organisations becoming the lead organisation and using resources for core costs, Members heard from Sport Wales that there have been no expressions of interests from this sector. In addition, Sport Wales confirmed that local authorities and partners in Sport North Wales are making in-kind contributions.

73. Members note the responses from Sport Wales and accept these. However, Members feel that Sport Wales has not taken on board the realities facing local authorities regarding the pressures they are under coupled with reducing resources. Members understand the concerns expressed by witnesses that some local authorities may see the introduction of regional sport partnerships as an opportunity to cut staff. This would be damaging to community sport provision.

#### **Reduction in local partnership working and community intelligence**

74. The Inquiry heard that, currently, local sports officers work with local partners to build up intelligence about what works in different communities regarding community sport provision. Members heard that approaches used in Splott would not necessarily work in Ely, for example, and that approaches used must vary according to the different communities being targeted to achieve optimum results,

75. As outlined in points 66-67, concerns were expressed that the regional sports partnership model could lead to some reduction in sports officer posts. Members heard that this would have consequences short term with a loss of community intelligence and partnership knowledge, and longer term for sports management and sports development.

76. In addition, Members heard that regional sports partnerships could lead to a loss of local relationships that make things work currently, due to staff changes and a regional way of working rather than a localised way of working.

77. Finally, Members heard that, for Cardiff, there would be another loss, in that a regional sports partnership would not be involved in Major Events in the same way local authorities are and therefore would struggle to lever in the additional community sport outreach that the local authority is able to as part of the process of planning the hosting of Major Events.

#### **Inequitable impact on Cardiff and its communities**

78. Concerns were expressed that the combination of all the issues highlighted above would result in Cardiff being especially affected, with a decline in community sports overall and for the most deprived communities in particular. Some witnesses felt this to be particularly unfair given that the current Joint Venture partnership is working well in

addressing participation and activity rates. There was a feeling amongst several witnesses that Cardiff would be disadvantaged because of issues elsewhere in Wales.

79. Sport Wales recognise there are concerns about what the partnerships will focus on and how they will work. They stated that it needs partners to own and develop the partnership, to help shape, grow and nurture the partnership. They believe there is a clear role for local authorities in this process; it is not Sport Wales’s role to lead the partnership.
80. Members understand the need for partnerships to find their own momentum. However, Members believe there is a role for Sport Wales to assist in the establishment of a partnership, particularly when it is clear there are issues with this.

## SWOT ANALYSIS

81. The terms of reference for this Inquiry include undertaking a SWOT analysis of the proposed Central South regional sports partnership. Members have used the evidence gathered during the inquiry to identify strengths, weaknesses, opportunities, and threats, which are set out below.

<p><b>Strengths</b></p> <ul style="list-style-type: none"> <li>○ Fresh, collective, partnership approach</li> <li>○ Evidence based approach – insight-led</li> <li>○ Builds on successful aspects of current approaches</li> <li>○ Shared learning of successful projects</li> <li>○ Asset based approach – join up great work</li> <li>○ Ensures everyone can participate and benefit from a lifelong enjoyment of physical activity</li> <li>○ One strong voice for sport – boosts profile and ensures place in local decision making</li> </ul>	<p><b>Opportunities</b></p> <ul style="list-style-type: none"> <li>○ Opportunity to boost activity and increase participation</li> <li>○ Opportunity to take greater ownership of National Lottery funding element</li> <li>○ Opportunity to align resources and enhance funding received by joining up planning and coordination.</li> </ul>
<p><b>Weaknesses</b></p> <ul style="list-style-type: none"> <li>○ Lack of governance framework</li> <li>○ Proposed Central South footprint <ul style="list-style-type: none"> <li>- Size</li> <li>- Diversity of areas included</li> <li>- Two health boards</li> <li>- Existing sports landscape</li> </ul> </li> <li>○ Lack of political oversight</li> <li>○ Lack of political input</li> <li>○ Lack of clarity re timeline</li> </ul>	<p><b>Threats</b></p> <ul style="list-style-type: none"> <li>○ Reduction in resources <ul style="list-style-type: none"> <li>- Sport roles cut - Local authority, Regional and National bodies</li> <li>- Specific reduction in funding received by Cardiff due to reprioritisation elsewhere</li> </ul> </li> <li>○ Less value for money from regional investment, due to broader commissioning</li> <li>○ Reduction in local partnership working</li> <li>○ Reduction in community intelligence</li> <li>○ Reduction in ability to lever in additional resource from Major Events</li> <li>○ Inequitable impact on Cardiff and its communities</li> </ul>

## REORGANISATION – OTHER POSSIBILITIES

82. The Inquiry asked witnesses for any alternative ideas for the reorganisation of community sport provision, given the landscape of reducing resources and the need to boost engagement and participation rates. The following suggestions were received:
- a. Cardiff footprint – that the local authority is a regional sports partnership in its own right, given its size, complexity of population and needs, existing successful Joint Venture with Cardiff Metropolitan University, and ability to utilise local partnership working and community intelligence to boost engagement and participation rates.
  - b. Cardiff & Vale of Glamorgan footprint – that the two local authorities form their own regional sports partnership, which would fit with the local health board, is a workable size and would build on already existing good partnership links and community intelligence.
  - c. Joint Venture model – that the successful, proven Joint Venture model that works well in Cardiff is continued and applied to other local authority areas.
  - d. 'As Is' Plus – community sport provision remain organised as is currently but boost cross-border working and sourcing of alternative funding. This should include closer integration with other local authorities at a Cabinet Member level, sharing expertise, and working with Health colleagues.
83. Members note these responses, which would lead to many of the benefits of the proposed Central South regional sports partnership without as many disadvantages.

## REORGANISATION – HOW TO PREPARE

84. The terms of this Inquiry included identifying what Cardiff Council needs to do to prepare for Regional Sports Partnerships. Witnesses highlighted the following key steps:
- a. Record accurate data re participation rates – this will be critical to demonstrate the needs in Cardiff. The Physical Activity and Sports Strategy, currently being drafted and due to be approved in early 2022, will be a key document to demonstrate needs, priority areas, and place-based approaches grounded in local knowledge and intelligence about what will work where.



- b. Adopt 'Whole Community' System Thinking – witnesses explained it is important to take a whole community approach to system thinking, so to plan to meet needs throughout life, via a range of provision, including non-sport provision that encourages an active life, such as active travel provision.
- c. Join up conversations across the sector – witnesses stressed it is important to join up conversations with all actors in community sport provision, including national organisations and smaller governing bodies that operate regionally. This will ensure conversations do not become disjointed and that they can help shape regional sport partnerships.
- d. Avoid parochialism – focus on the needs of citizens and the need to boost engagement and participation rates to ensure parochialism does not take hold.
- e. Build trust and commitment – Sport Wales were clear that it is essential to build trust and commitment levels of local partners by being clear on what the partnership is there to do and how it complements local delivery. They stated this is evidenced in the Sport North Wales work – trust is key to then be able to build partnership and commitment on.

85. Members note these points.

## SPORT NORTH WALES

86. The terms of reference for this Inquiry included considering the pilot regional sport partnership in North Wales, called Sport North Wales, to understand lessons learnt during its development and to identify lessons relevant to the Central South regional sport partnership. Work on Sport North Wales commenced 5-6 years ago. Sport Wales clarified that Sport North Wales is an early adopter rather than a pilot, given that regional sport partnerships can develop and evolve in a variety of ways to suit the needs of their area. Sport Wales provided the information below in points 87– 97.
87. Sport North Wales includes six local authorities, Public Health Wales, Betsi Cadwaladr University Health Board, Glyndwr University, Bangor University, North Wales Housing Associating (including six local housing associations), North Wales Education Consortia, and Disability Sport Wales. It is connecting with organisations such as the North Wales Regional Equality Network. It is likely the Sports Partnership will connect with other

regional bodies such as, for example, the North Wales Economic Ambition Board and the office of North Wales Police and Crime Commissioner.

88. The local authorities played an active role in its formation, with one of the Chief Executives leading the project. A Collaboration Board was established and met monthly, which was important to build working relationships and develop trust amongst the partnership. This trust supported the creation of the regional vision and strategic framework and became an important step in developing common understanding, shared purpose and ultimately trust in that everyone is committed to the partnership and believes that it can deliver positive outcomes for its citizens. Trust also helped to support the agreement of a governance framework which supported the ambition of the Sports Partnership.
89. The Sport North Wales governance model has been developed to meet the requirements of the Governance and Leadership Framework and Sport Wales Capability Framework and was self-determined by the partnership members following a detailed review and options appraisal.
90. The Sport North Wales Partnership Board is skills based. Led by a Chair who was externally recruited, it is a blend of partner representative and independent appointed experts providing a modern, agile, and diverse approach to North Wales strategy, governance, and decision-making. They have appointed a Regional Director and other paid officers.
91. The Sport North Wales partnership has developed a Strategic Plan that presents a shared Regional Vision, Purpose, and key themes: Start Active, Being Active, Staying Active & ReStart. They proactively engaged with the existing sports development workforce to develop their vision and strategic framework. The drafting of the strategic plan was devolved to the delivery teams and representatives of the partners. This took the form of 4 workshop days (engaging approx. 30 reps per session) resulting in a strategic vision and delivery framework. All 6 local authorities were heavily involved and consulted throughout this process. This process led to the creation of a regional planning group. Sport North Wales undertook an equalities impact assessment during the creation of their emerging vision and strategic framework, supported by an Equalities Statement of Intent.

92. The regional planning group has been established to support the creation of a regional delivery plan and its implementation as well as having the ability to horizon-scan for future risks, opportunities, and regional need. Each partner can deliver against the framework, identifying which of the theme/s are most important to their local area. Regional operational planning for 22/23 and in subsequent years will be aligned to the Strategy framework, given that all partners were engaged in its development.
93. The amount of Sport Wales funding for Sport North Wales has not changed from the amount that used to go to the local authorities. However, the partnership identified early what additional resource it would take to move forward proactively in addition to their individual commitments and leadership roles and are making in-kind contributions where needed. In addition, the partnership has already attracted additional funding through its partnership with Public Health Wales and are actively connecting with ‘Get North Wales Moving’. Sport North Wales also plan to explore commercial and other revenue stream partnerships moving forward.
94. Sport North Wales has begun conversations about how to address some of the differences across the region and re-allocate funding based on need. Future programming will be evidence led, supported by regional insight. The development lead officers are for the first time working more collaboratively across the region, currently using the Upshot IT system on behalf of the partnership. Sport North Wales is currently refreshing a partner and systems mapping exercise to identify additional stakeholders and partners who can contribute to the delivery of their vision and purpose.
95. Overall, the Sport North Wales partners have co-created a Sports Partnership which is right for their region – they see the value of the wider partnership approach and the added value this will bring to their communities. They are also clear on how their structure and set up will compliment (not duplicate) other regional bodies and the opportunity this brings to sell the benefits of sport in wider agendas. Sport North Wales is currently developing a brand identity for the region, connecting the various stakeholders and delivery partners against a common purpose.

### Lessons Learnt

96. Sport Wales clarified that a learning log approach has been taken throughout the early adopter phase. Key lessons to date include:

- Early identification of purpose and role is very important – this is up to the partnership to determine, not Sport Wales – need to enable partners to come together and establish this
- People and partnerships - need to recognise these are already busy and committed and give them time and space to operate and be comfortable with what they are doing – Sport Wales can offer some small resource to help this process
- Partnership lead, Sport Wales offer support
- Up to regional partnership to identify best way to corral partners to meet needs of region – does mean there will be some difficult conversations, but Sport North Wales has managed to do this.
- Building trust and commitment is key.
- Funding – has successfully drawn in funding that might not otherwise have happened.

97. Sport Wales emphasised that Sport North Wales became operational 6-8 months ago and so it is too early to know its impact.

98. Members were surprised to find that no reports have been produced on the process of establishing the partnership and emerging lessons that could be useful for other partnerships. Members recognise Sport Wales's point that regional partnerships can vary but feel it would be useful to understand and share the lessons from Sport North Wales to date with other areas of Wales, notwithstanding that there will be differences between the areas in terms of demographics, need, and engagement and participation rates, as it is more the lessons on building a successful partnership and implementing the new approach that will be of value.

## APPROACH TAKEN

- M1. Members undertook this Inquiry during November and December 2021.
- M2. Members received evidence from the following internal stakeholders who attended question & answer sessions and contributed to a panel discussion:
- Cllr Peter Bradbury, Cabinet Member – Culture & Leisure
  - Neil Hanratty – Director of Economic Development
  - Steve Morris – Operational Manager – Sport, Leisure and Development.
- M3. Members also received evidence from the following external stakeholders:
- Laura Williams – Assistant Director of Sport, Physical Activity & Health, Cardiff Metropolitan University
  - Ben O’Connell – Director of Sport, Cardiff Metropolitan University
  - Brian Davies – Acting Chief Executive, Sport Wales
  - Graham Williams – Director, Sport Intelligence and Service Development.
- M4. Scrutiny Services wrote to the other local authorities in the Central South regional sport partnership area, offering them the opportunity to contribute to the Inquiry by sharing their views on the proposed partnership approach. Members were particularly keen to understand their perspectives. Initially, local authorities indicated they would like to contribute. However, following the cancellation of a meeting between them and Sport Wales in early November, the local authorities declined to contribute as they had been hoping to receive clarity from Sport Wales on the current status of the regional partnership approach before commenting and, lacking this, felt that their comments would not be meaningful or helpful.
- M5. To inform the Inquiry, Members were provided with information detailing the policy context, directions from Welsh Government, and Sport Wales publications relevant to Regional Sport Partnerships.
- M6. The evidence has been used to identify suitable findings from the Inquiry.

## **FINANCIAL IMPLICATIONS**

The Scrutiny Committee is empowered to enquire, consider, review, and recommend but not to make policy decisions. As the recommendations in this report are to consider and review matters there are no direct financial implications at this stage in relation to any of the work programme. However, financial implications may arise if and when the matters under review are implemented with or without any modifications.

## **LEGAL IMPLICATIONS**

The Scrutiny Committee is empowered to enquire, consider, review, and recommend but not to make policy decisions. As the recommendations in this report are to consider and review matters there are no direct legal implications. However, legal implications may arise if and when the matters under review are implemented with or without modification. Any report with recommendations for decision that goes to Cabinet / Council will set out any legal implications arising from those recommendations. All decisions taken by or on behalf of the Council must (a) be within the legal power of the Council; (b) comply with any procedural requirement imposed by law; (c) be within the powers of the body or person exercising powers on behalf of the Council; (d) be undertaken in accordance with the procedural requirements imposed by the Council e.g. standing orders and financial regulations; (e) be fully and properly informed; (f) be properly motivated; (g) be taken having regard to the Council's fiduciary duty to its taxpayers; and (h) be reasonable and proper in all the circumstances.

## COMMITTEE TERMS OF REFERENCE

- To scrutinise, measure and actively promote improvement in the Council's performance in the provision of services and compliance with Council policies, aims and objectives in the area of economic regeneration.
  - Cardiff City Region City Deal
  - Inward Investment and the marketing of Cardiff
  - South East Wales Economic Forum
  - Economic Strategy & Employment
  - European Funding & Investment
  - Small to Medium Enterprise Support
  - Cardiff Harbour Authority
  - Lifelong Learning
  - Leisure Centres
  - Sports Development
  - Parks & Green Spaces
  - Libraries, Arts & Culture
  - Civic Buildings
  - Events & Tourism
  - Strategic Projects
  - Innovation & Technology Centres
  - Local Training & Enterprise

- To assess the impact of partnerships with and resources and services provided by external organisations including the Welsh Government, joint local government services, Welsh Government Sponsored Public Bodies, and quasi-departmental non-governmental bodies on the effectiveness of Council service delivery.
- To report to an appropriate Cabinet or Council meeting on its findings and to make recommendations on measures, which may enhance Council performance or service delivery in this area.



## Economy & Culture Scrutiny Committee Membership



Councillor Nigel Howells  
(Chairperson)



Councillor Iona Gordon



Councillor Jane Henshaw



Councillor Gavin Hill-John



Councillor Chris Lay



Councillor Thomas Parkhill



Councillor Adrian Robson



Councillor Abdul Sattar



Councillor Ed Stubbs



**CABINET RESPONSE TO THE RECOMMENDATIONS OF THE ECONOMY AND CULTURE SCRUTINY COMMITTEE - COMMUNITY SPORT IN CARDIFF: REGIONAL PARTNERSHIPS**

RECOMMENDATION	CABINET RESPONSE
<p>1. Cabinet urgently pursues with Sport Wales the feasibility of maintaining our current existing Joint Venture partnership with Cardiff Metropolitan University rather than entering a Regional Sport Partnership.</p>	<p><b>Accepted.</b> The case will be made to Sport Wales Senior Management Team for a Cardiff or Cardiff and Vale partnership. The Cardiff case will also be taken to the Central South regional forum stating the Cardiff position.</p>
<p>2. Cabinet takes up Sport Wales's offer to engage to: a) enable political input and to build political mandate; b) lobby for a reduced footprint, either Cardiff-only or one based on the Cardiff &amp; Vale University Health Board footprint; c) work collaboratively to achieve agreement on the reduced footprint as set out above</p>	<p><b>Accepted.</b> Political position from Scrutiny and Cabinet to be presented to Sport Wales to enable open discussion on options for a new operating model that sustains the current future levels of resource for Cardiff. Sport Wales insist on a Central South Regional Board but with potential for a second tier split for two health board regions that covers the entire region.</p>
<p>3. Cabinet actively engages with the Regional Sport Partnership development process to build trust and commitment</p>	<p><b>Accepted.</b> Ongoing commitment to attend the Central South forums led by Sport Wales and for Cardiff Council and our delivery partner Cardiff Metropolitan University (Sport Cardiff), to lead and lobby on behalf of the Central South regional local authorities.</p>
<p>4. Cabinet works collaboratively with Regional Sport Partnership partners to agree governance arrangements that ensure Cardiff's voice is heard in proportion to population size.</p>	<p><b>Accepted.</b> Ongoing commitment to attend the Central South forums and support the group in partnership with Cardiff Metropolitan University (Sport Cardiff), ensuring Cardiff objectives set out in the Physical Activity for Sport strategy are protected and delivered.</p>
<p>5. Cabinet seeks assurance from Sport Wales that priorities identified for Cardiff will not be diluted in any regional partnership and funding will not be diluted.</p>	<p><b>Partially accepted.</b> The model is still to be developed, the governance and lead is in development and undecided and therefore there are no assurances that Cardiff or other regions will not be at detriment.</p>
<p>6. Cabinet seeks clarification from Sport Wales on their basic expectations regarding governance models.</p>	<p><b>Accepted.</b> Sport Wales are not set on a specific model and request the central south group to collaborate and decide on the best governance structure.</p> <p>This is in development and Cardiff are well represented to determine future governance models as well as reviewing the current model in North Wales.</p>

Mae'r dudalen hon yn wag yn fwriadol

**CABINET MEETING: 28 SEPTEMBER 2022**

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**SCHOOL ORGANISATION PROPOSALS: PROVISION FOR CHILDREN AND YOUNG PEOPLE WITH ADDITIONAL LEARNING NEEDS (ALN)**

**COMPLEX LEARNING NEEDS AND AUTISM SPECTRUM CONDITION PROVISION FOR PRIMARY AND SECONDARY AGED PUPILS**

**EDUCATION (COUNCILLOR SARAH MERRY)**

**AGENDA ITEM: 5**

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**Reason for this Report**

1. This report is to inform the Cabinet of any objections received to the published statutory notices to:
  - Increase the designated number of Meadowbank Special School from 40 to 98 from September 2022.
  - Increase the designated number of the Specialist Resource Base for children with severe and complex learning needs at Marlborough Primary School from 20 to 30 places from September 2022.
  - Increase the designated number of the Specialist Resource Base for children with Autism Spectrum Condition at Springwood Primary School from 20 to 28 places from September 2022.
2. To enable the Cabinet to consider the proposal by the Governing Body of the Bishop of Llandaff Church in Wales (CiW) High School to:
  - Increase the designated number at The Marion Centre Specialist Resource Base from 42 to 66 places from September 2022.
3. To note the publication of a statutory notice in respect of proposals published by the Governing Body of Whitchurch High School to expand its Specialist Resource Base from 70 places to 100 places from September 2022, and future determination of the proposal.

## Background

4. At its meeting on 14 October 2021 the Cabinet authorised officers to consult on proposals to increase the designated number of places at a number of schools, including Meadowbank Special School, Marlborough Primary School and Springwood Primary School. A copy of the Cabinet Report of 14 October 2021 is attached as Appendix 1.
5. The Cabinet also noted the proposal to increase the designated number of places at The Marion Centre Specialist Resource Base at The Bishop of Llandaff Church in Wales High School, and at Whitchurch High School Specialist Resource Base, and instructed officers to provide all reasonable assistance to the Governing Bodies of each school who would be consulting on the proposal.
6. The report outlined that, while the 21st Century Schools Band B Programme will provide opportunities to address special school sufficiency issues, there will also be a need to take steps to extend provision to meet demand for places beyond this. The principles of achieving an effective, inclusive approach to supporting ALN in Cardiff were identified in the report as:
  - Schools and settings that deliver an innovative curriculum with effective whole school approaches to teaching and learning; emotional health and wellbeing.
  - Excellent specialist services to enhance the capacity of schools and other settings to include children and young people with a range of ALN
  - Effective early identification and research-based intervention to prevent the escalation of ALN wherever possible
  - High levels of accessibility in every school building with sufficient flexible accommodation in every school appropriate to the age and stage of learning
  - Strong partnerships to ensure a holistic, collaborative response to a child or young person's ALN (including health, children and adult services, early years and FE providers)
  - Effective multi-agency transition planning at every stage, from early years through to primary, secondary
7. The proposed expansion of special school and Specialist Resource Base provision provides a strategic solution that focuses on sustainable growth of established and successful specialist provision and reduces the Council's reliance on out of county and independent placements in coming years.
8. The consultation period for proposals to expand Complex Learning Needs and Autism Spectrum Condition Specialist Resource Base provision ran from 14 December 2021 until 01 February 2022. The consultation process for each of the proposals was detailed in a report considered by Cabinet on 10 March 2022. A copy of the Cabinet Report of 10 March 2022 is attached as Appendix 2.

### Marlborough Primary School, Meadowbank Special School and Springwood Primary School Proposals

9. At its meeting on 10 March 2022 the Cabinet in accordance with the terms of the Schools Standards and Organisation (Wales) Act, approved a recommendation for the publication of statutory notices relating to the schools as set out at paragraph 1.
10. Statutory notices for a number of proposals were published on 6 May 2022 and were subsequently determined by the Cabinet at its meeting on 14 July 2022.
11. The statutory notices for Meadowbank Special School, Marlborough Primary School and Springwood Primary School were published on 08 June 2022 for a period of 28 days to allow for objections. The statutory notice period expired on 05 July 2022. Copies of the notices are attached at Appendix 3.
12. The notices were published on the Council's website, and hard copies were posted at the relevant school sites.
13. Copies of the notices were distributed via e-mail to organisations and consultees required under the School Organisation Code 2018.
14. Residents and businesses in the areas local to each school were notified of publication of the statutory notices by letter.
15. In accordance with the requirements of the School Organisation Code the Council's Cabinet has responsibility for the determination of school organisation proposals including those which receive objections (save for those that are required to be considered by the Welsh Government).
16. In accordance with this the Cabinet must decide whether to approve, reject or approve with modifications, the proposals. The Council must not approach the decision with a closed mind and any objections must be conscientiously considered.

### The Proposed Expansion of The Marion Centre Specialist Resource Base at The Bishop of Llandaff Church in Wales High School

17. At its meeting on 14 October 2021 the Cabinet noted that a statutory consultation on the proposed increase to the designated number at The Marion Centre Specialist Resource Base from 42 to 66 places from September 2022 was to be undertaken and authorised officers to provide all reasonable assistance to the Governing Body of The Bishop of Llandaff Church in Wales High School.
18. The consultation ran from 14 December 2021 to 01 February 2022 and was supported by Cardiff Council. A copy of the consultation document can be seen at Appendix 4.

19. Following the consultation, a consultation report setting out details of the consultation, responses received, and The Bishop of Llandaff CiW High School Governing Body's response was published by the Governing Body on 10 June 2022. A copy of the consultation report can be seen at Appendix 5.
20. At its meeting on 14 June 2022, The Bishop of Llandaff CiW High School Governing Body agreed the publication of a statutory notice to:
  - Increase the designated number at The Marion Centre Specialist Resource Base from 42 to 66 places from September 2022.
21. A copy of the minutes from The Bishop of Llandaff CiW High School Governing Body meeting on 14 June 2022 can be seen at Appendix 6.
22. The statutory notice was published on 30 June 2022 for a period of 28 days to allow for objections. The statutory notice period expired on 27 July 2022. A copy of the notice can be seen at Appendix 7.
23. The notice was published on The Bishop of Llandaff CiW High School website, on the Council's website, and hard copies were posted at the relevant school sites.
24. Copies of the notice were distributed via e-mail to organisations and consultees required under the School Organisation Code 2018.
25. Residents and businesses in the local area were notified of publication of the statutory notices by letter.
26. The Governing Body received one objection by the statutory notice closing date.
27. An objection report setting out details of the objection and the Governing Body's response was published by The Bishop of Llandaff CiW High School Governing Body on 23 August 2022. A copy of the Objection Report can be seen at Appendix 8.
28. Proposals published under section 48 of the School Standards and Organisation (Wales) Act require approval by the local authority if they have been made by a proposer other than the local authority and an objection to the proposals has been made and not been withdrawn in writing before the end of 28 days beginning with the end of the objection period.
29. Where proposals require approval by the local authority, the proposer must notify the local authority of a proposal requiring approval and forward to them the documents listed below within 35 days of the end of the objection period:
  - A copy of the consultation document;
  - A copy of the consultation report;
  - A copy of the published notice;



- A copy of the objection report;
  - Copies of the statutory objections;
  - Copies of all the above in relation to any proposals which are related to the proposal requiring approval.
30. Local authorities must decide whether to approve, reject or approve with modifications, the proposals.

#### The Proposed Expansion of the Whitchurch High School Specialist Resource Base

31. At its meeting on 14 October 2021 the Cabinet noted that a statutory consultation on the proposed increase to the designated number of the Specialist Resource Base at Whitchurch High School from 70 to 100 places from September 2022 was to be undertaken and authorised officers to provide all reasonable assistance to the Governing Body of Whitchurch High School.
32. The consultation ran from 14 December 2021 to 01 February 2022 and was supported by Cardiff Council. A copy of the consultation document can be seen at Appendix 4.
33. Following the consultation, a consultation report setting out details of the consultation, responses received, and The Whitchurch High School Governing Body's response was published by the Governing Body on 14 June 2022. A copy of the consultation report can be seen at Appendix 9.
34. At its meeting on 20 June 2022, The Whitchurch High School Governing Body agreed the publication of a statutory notice to:
- Increase the designated number at the Whitchurch High School Specialist Resource Base from 70 to 100 places from September 2022.
35. The statutory notice was published on 30 June 2022 for a period of 28 days to allow for objections. The statutory notice period expired on 27 July 2022. A copy of the notice can be seen at Appendix 10.
36. The notice was published on the Whitchurch High School website, on the Council's website, and hard copies were posted at the relevant school sites.
37. Copies of the notice were distributed via e-mail to organisations and consultees required under the School Organisation Code 2018.
38. Residents and businesses in the local area were notified of publication of the statutory notices by letter.
39. The Governing Body of Whitchurch High School received no objections by the published statutory notice closing date. In accordance with the requirements of the School Organisation Code, the Governing Body will determine the proposal in autumn 2022.

## **Issues**

40. Parts 1.3 to 1.14 of the Code set out the factors that should be taken into account by the relevant bodies (the Welsh Ministers, local authorities, governing bodies and other promoters) when exercising their functions of preparing and publishing school organisation proposals, and or approving/determining them.

## **Objections Received**

41. There were no objections to the proposal to increase the designated number of Meadowbank Special School from 40 to 98 places from September 2022.
42. There were no objections to the proposal to increase the designated number of the Specialist Resource Base for children with severe and complex learning needs at Marlborough Primary School from 20 to 30 places from September 2022.
43. There were no objections to the proposal to increase the designated number of the Specialist Resource Base for children with Autism Spectrum Condition at Springwood Primary School from 20 to 28 places from September 2022.
44. There was one objection to the published proposal for The Marion Centre Specialist Resource Base at The Bishop of Llandaff Church in Wales High School.
45. A summary of the objection received, and the Governing Body's response, is included in the Objection Report attached as Appendix 8.

## **Requirements of the School Organisation Code**

46. As set out in the School Organisation Code, the following factors should be taken into account by relevant bodies when exercising their function of approving/determining proposals. The Council must at all times consider the interests of learners.

## **Section 1.3 Quality and Standards in Education**

47. The Council works closely with the governing bodies of schools to make sure that standards in schools are high, that teaching is good, and that leadership and governance is strong.
48. As set out in the consultation document, standards at the Marlborough Primary School, Meadowbank Special School and Springwood Primary School are good. Increasing the number of specialist pupil places or establishing specialist resource base provisions at the schools would provide appropriate high quality school places for young people with complex learning needs and autism.

49. The proposals are not expected to have any negative impact on the quality of standards of education at these schools as a result of the proposed changes.
50. The proposals are not expected to have any negative impact on teaching and learning experiences at any of these schools.
51. The opportunity to employ specialist staff and to work more closely with specialist services in Cardiff would have the potential to enhance the mainstream schools' capacity for inclusion and benefit all pupils in the schools. The relevant arrangements and staffing structures are already in place at Marlborough Primary School and Springwood Primary School.
52. Some pupils with Additional Learning Needs can find change difficult and may find moving to a new building on a new site unsettling. The Council has worked, and is continuing to work, closely with Meadowbank Special School to plan and support their transition to adapt to their new accommodation.
53. The Bishop of Llandaff Church in Wales High School is recognised as a high performing school. In its most recent Estyn and Diocesan inspections, it was rated as 'excellent' in all categories. Copies of these reports are available via the school website [www.bishopofllandaff.org](http://www.bishopofllandaff.org)
54. The school continues to work with all stakeholders, including the Diocese of Llandaff and the Council, to sustain the high-quality education offered at the school for all its students.
55. Standards at the school, which includes The Marion Centre, are consistently outstanding, as seen over a sustained period of time. Increasing the number of places in the Specialist Resource Base provision would provide appropriate high-quality school places for young people with autism.
56. Existing students within The Marion Centre receive a bespoke and high-quality educational experience that enables them to make strong progress in their learning and development, relative to their individual need. Since the creation of The Marion Centre, every student has successfully transferred to an appropriate onward destination, aged between 16 to 19 years.
57. The Governing Body does not expect the proposal to impact on standards at the school. It is not expected to have any negative impact on the quality and/or standards of education at the school, or the centre, as a result of the proposed change.
58. The proposal is not expected to have any negative impact on teaching and learning experiences at the school. The school has an appropriate range of policies and provision in place to promote students' health and wellbeing; the school is committed to providing an environment in which learning is valued; and students achieve their potential in a happy, safe environment in which they show respect and tolerance for each other.

59. The school continues to work to make sure everyone understands their responsibility for helping to improve and sustain high performance. The school, including The Marion Centre, has excellent relationships with parents and other partners and, as a result, students receive a high-quality education.
60. The proposed changes were planned carefully so that leadership and governance is not disrupted, which could have a negative impact on educational standards.

#### **Section 1.4 Need for Places and the Impact on Accessibility of Schools**

61. The majority of learners with Additional Learning Needs (ALN) attend a local mainstream school and benefit from effective Additional Learning Needs Provision (ALP). These learners do not need to attend a special school or Specialist Resource Base.
62. However, the number of pupils with severe and complex needs, who need a place in a special school or specialist resource base has continued to grow.
63. This is due to a number of factors including:
  - pupil population changes
  - improved survival rates for children born with significant disabilities,
  - increased complexity in needs
  - increased incidence and identification of specific needs such as autism, ADHD, physical disabilities and sensory impairments
64. The range of expertise, specialist support and facilities required in special schools and Specialist Resource Bases has also increased.
65. At the end of March 2021, there were 2,265 children in Cardiff with a statement of Special Education Needs. As the population grows, so will the number of children and young people with significant and complex Additional Learning Needs that will potentially need a specialist place.
66. In 2020/21 Cardiff Council funded 1,116 places in Specialist Resource Bases or special schools. In addition, 48 temporary places for learners were available in Wellbeing Classes and Speech and Language Classes, and 90 places were available in the Pupil Referral Unit (PRU).
67. Whilst there are a number of existing specialist settings across Cardiff, there are not enough places available. The number of children who would benefit from a place is projected to increase over coming years.
68. The proposals would increase the number of specialist resource places for primary, secondary and post-16 aged learners with complex learning needs and autism and would contribute towards meeting projected demand.

69. The proposals would also improve the overall distribution of specialist provision across Cardiff. This would mean that learners living in all areas of the city have the potential to access specialist provision closer to home, reducing the time they spend travelling to and from school.

### **Section 1.5 Resourcing of Education and Other Financial Implications**

70. The Council has a statutory duty to provide places appropriate to the needs of learners.
71. Currently, as there is insufficient specialist provision within Cardiff, the Council has funded some places at special schools in other Council areas or in independent schools. The total spend on such specialist provision was £7.3m in 2021/22. The budget for 2022/23 for these types of places is currently set at £7.6m.
72. The four proposals that require determination by the Cabinet would provide 100 additional places in Cardiff schools for learners with Complex Learning Needs and/ or Autism Spectrum Condition, which would offset the projected increase in spending on places in other Council areas or in independent schools. These are in addition to the 221 additional places determined by the Cabinet at its meeting on 14 July 2022. Without investment in additional in-county places, such spending on places would be expected to grow significantly in future years.
73. It should be noted that the designated number of specialist places at each of the schools has already been exceeded on a temporary basis. Marlborough Primary School, Springwood Primary School and The Marion Centre Specialist Resource Base are each operating at their full planned capacity in 2021/ 2022 and are expected to continue to operate at full capacity in coming years.
74. The capital cost of works to expand special schools and to establish or expand Specialist Resource Bases would be met from the Council's Education asset renewal programme. This is a five-year programme which prioritises works including ALN sufficiency, condition and suitability. The capital cost of works total circa £4.2m to implement the proposed changes and are subject to a competitive tender process to ensure best value for the Council.
75. The differential in average per-pupil revenue costs between placements in Cardiff's special schools and Specialist Resource Bases, and in alternative independent provision, vary greatly. The current differential in average per-pupil revenue costs between placements at a Cardiff special school, and in alternative independent provision, are greater than £50,000 per year, per learner, plus transport costs. However, there are not sufficient places available in other Council areas or in independent schools within a reasonable travel distance for the number of learners projected to require such support.
76. In summer 2022, the number of pupils enrolled at Meadowbank Special School totalled 50. The additional costs per place at Meadowbank

Special School have been calculated at £18,500 per learner based on 2022/23 Category A funding levels. The admission of 48 additional learners to the school would be phased over coming years.

77. The annual cost to the Council of school transport for learners with Complex Learning Needs / Autism Spectrum Condition to within-County provision averaged c£5,000 per learner in 2021/ 2022. The annual cost to the Council of school transport for learners with Complex Learning Needs / Autism Spectrum Condition to alternative independent provision is c10,000 per child. However, transport costs can fluctuate considerably depending on the home address of the pupils attending a special school.
78. The implementation of the proposed changes would incur increased home to school transport costs for the Council. It is anticipated that the number of learners provided with free home to school transport to Marlborough Primary School, Springwood Primary School and The Marion Centre will be at a similar level to that in 2021/2022.
79. The number of learners provided with free home to school transport to Meadowbank Special School would increase. The annual cost to the Council of school transport to Meadowbank Special School averaged £4,226 per learner in 2021/ 2022.
80. The distribution of the proposed additional places throughout the city seeks to better match the provision to demand. Should the proposed changes not proceed, it is anticipated that the average journey lengths to alternative provision, and costs for home to school transport, would substantially increase.
81. When compared to the approximate cost of a Complex Learning Needs / Autism Spectrum Condition placement in alternative provision, the additional revenue costs of 48 additional places at Meadowbank Special School would total c£888,000 based on the current average of c£18,500 per learner. When compared to placements in alternative independent provision at c£50,000 per learner, the expansion of Meadowbank to meet these learners' needs would reduce the Council's cost liability by c£1,512,000 for placements alone. Overall, the proposed changes would result in a more efficient use of financial resources compared with spending on placements in, and transport to, other Council areas or independent schools.
82. A summary of the financial modelling of the additional placements outlined in paragraphs 1-3, and of the additional specialist placements determined by the Cabinet at its meeting on 14 July 2022, is attached at Appendix 11. A summary of the financial modelling of the home to school transport costs for these additional specialist placements is attached at Appendix 12.

## **Section 1.6 Other General Factors**

83. The Council does not expect the proposal to have any negative impact on the quality and standards of education for children from economically deprived backgrounds.

## **Section 1.14 Additional Factors to be Taken into Account in Preparing, Publishing, Approving or Determining Proposals for the Reorganisation of SEN Provision**

84. The lack of Specialist Resource Bases in some localities can disadvantage learners living in those areas. Some families are unfamiliar with the areas where provision is located. Parents or carers may lack the means to travel easily to those areas.
85. The proposed expansion of Specialist Resource Bases provision would result in a better distribution of specialist resource bases across the city and would improve access for pupils. It would reduce travel times for many pupils, as well as increasing the number of places available.
86. The current expertise and inclusive practice would be maintained and built upon.
87. The additional places would help to ensure that there are sufficient places to meet increased demand arising out of a growing pupil population and a growing incidence and identification of Complex Learning Needs and Autism Spectrum Condition needs in Cardiff.
88. It is not expected that the proposed expansion of Complex Learning Needs and Autism Spectrum Condition provision at the schools subject to these proposals will impact on existing Additional Learning Needs provision. It is expected to improve distribution and appropriate placements compared to the current position.

## **Section 1.15 Factors to be taken into account in approving/ determining school organisation proposals**

89. There are no related school organisation proposals.
90. The consultations on the proposed changes were carried out in accordance with the requirements of the Welsh Government School Organisation Code (November 2018).
91. The consultation documents were sent to those identified in the Code, and pupils at local schools were consulted. The required amount of time (42 days of which at least 20 are school days) was provided to respond to the consultation.
92. The consultation documents contained the prescribed information as set out in the Code.

93. The timescale and content required have been complied with in relation to the consultation report.
94. The publication of the statutory notices complied with the requirements of the Code and the notices contained all of the prescribed information.

### **The Bishop Of Llandaff Church in Wales High School Objection Report**

95. The Governing Body of The Bishop of Llandaff Church in Wales High School received one objection by the statutory notice closing date to the proposed expansion of The Marion Centre Specialist Resource Base.
96. In accordance with the requirements of the School Organisation Code, the Governing Body published an Objection Report.
97. There were a number of points raised in the objection. The Governing Body has considered the merits of the objection and has appraised these in its objection report, attached as Appendix 8.

### **Admissions**

98. There are no plans to change the Council's policy on the admission of children to schools, as a result of or associated with these proposals.
99. Admissions to specialist provision are managed by the local authority and subject to a statement of Special Educational Needs (SEN) or Individual Development Plan (IDP) as appropriate.

### **Partnerships**

100. The [Cardiff Commitment](#) is a vision which the city of Cardiff is dedicated to realising and that seeks to ensure all children and young people have access to opportunities that deliver ambition and skills and supports them to progress into education, employment, and training.
101. The **Cardiff Commitment** through school, employer networks (in growth sectors of the economy in particular), community, further and higher education partnerships, delivers knowledge, skills and experiences for pupils to fulfil their potential and contribute to the economic growth of our capital city.
102. The **Cardiff Commitment** works with employers to support the development of learning pathways, careers and work related experiences and collaboration to co-construct authentic learning experiences with industry as per the requirements of the [Curriculum for Wales](#) with a focus on supporting children and young people who need it most.
103. Through the Cardiff Commitment, the Council has built a city-wide alliance to support educational achievement; in particular to raise the aspirations of learners, create opportunities, develop skills and support progression into the world of work. The number and breadth of partners



involved has grown significantly since 2016, with over 300 partners now involved in various ways.

104. This approach enables both universal and targeted programmes to work together and stay focused upon the shared vision that any child growing up in Cardiff should have equal opportunity to realise their potential. And importantly that the journey to independence is a continuum that should be nurtured from primary school into secondary school, and through to Post 16 education, training and employment.
105. The breadth of companies now involved with the initiative is 300+ and the significance of the pledges they make opens up a variety of opportunities for children and young people as the Cardiff Commitment is utilised as a touch stone for all Council relationships with employers.
106. The Council's proposals for Band B of the Sustainable Communities for Learning Programme (formerly 21st Century Schools Programme) and the Cardiff 2030 strategy clearly state the link between improving the environment for learning and raising standards of achievement.
107. Accelerator projects led by the Core Team and undertaken with schools are informed by data held in relation to FSM, LACE, ALN and Wales Index of Multiple Deprivation areas. The Cardiff Commitment accelerator areas aim to get most benefit and value from partnerships and look to provide sustainable and scalable approaches for schools and employers. Six Priority Areas support the development of opportunities and include creating school/business partnerships to deliver experiences of work and target skills development in the key economic growth sectors of the Cardiff Capital Region across age continuum.
108. An example of this is the Business Forum approach which sees partners from across the Growth Sectors in the region working with schools to develop opportunities and skills which support ambition and progression into education, employment and training.
109. The significant school developments proposed would provide opportunities for strong partnerships with businesses and employers from a range of sectors in the Cardiff economy. Opportunities for further partnerships are being explored and will be progressed in line with the priorities set out in the Cardiff Commitment.

### **Impact of the proposals on the Welsh Language**

110. The Council is committed to developing a Bilingual Cardiff.
111. Cardiff's Welsh in Education Strategic Plan (WESP) 2022-2031 sets out a series of ambitious commitments to build on the progress achieved to date. These will ensure that every child in the city can receive an education in the language of Welsh, the number receiving their education in Welsh-medium schools will increase, and through the significant use of Welsh in English medium education all will have the opportunity to become confident in speaking Welsh.

112. The level of special educational needs/ additional learning needs in the Welsh-medium sector has historically been lower than in the English medium sector. This has however been changing over the last 4-5 years, with schools reporting an increased incidence of additional learning needs, in all areas of need.
113. A review of additional learning needs in the Welsh-medium sector was undertaken with Welsh medium schools in 2016 to inform the Welsh in Education Strategic Plan (WESP). Schools reported a small but significant number of examples of pupils with additional learning needs leaving the Welsh-medium sector in order to access Specialist Resource Bases or special schools.
114. There was also some anecdotal evidence to suggest that some families who would otherwise choose Welsh-medium education opt instead for English-medium if their child has additional learning needs, through concern that their child may need to transfer to the specialist sector at a later date.
115. Through the WESP, Cardiff has invested in specialist provision in the sector, including some capacity to respond to growing demand and to generate more confidence in the availability of specialist provision in the sector.
116. A new primary base was established at Ysgol Gymraeg Pwll Coch, within the catchment area of Ysgol Gyfun Gymraeg Glantaf, where the secondary base is established. The two bases cater for learners with severe learning difficulties, providing a specialist curriculum and supporting a range of secondary needs including physical and medical needs, speech and language difficulties and autism.
117. As the Welsh sector continues to grow it will be important to develop additional provision in anticipation of the need, to ensure Welsh-medium education is a genuine choice for learners with complex additional learning needs.
118. Following engagement sessions with members of Cardiff's Welsh Education Forum in summer 2021, the Council formally consulted on its draft Welsh in Education Strategic Plan (WESP) 2022-2032 between 15 October 2021 and 13 December 2021.
119. Links to the plan (including the full draft WESP, the easy read summary version and the Trajectory for Growth) and survey webpage were circulated to statutory stakeholders including Cardiff schools and Cardiff's Welsh Education Forum member organisations.
120. The draft WESP sets out the strategy for the development of Welsh-medium additional learning needs provision and proposals would be brought forward as part of the implementation of the Council's Welsh in Education Strategic Plan following agreement of the strategy by the Welsh Government and formal adoption by the Council later in 2022.

121. The Cabinet approved Cardiff's WESP 2022-2031 at its meeting of 24 February 2022, for submission to the Welsh Government Ministers.
122. The ongoing development of additional learning needs provision including new and existing provision will be kept under review to ensure proposals are brought forward in a strategic and holistic way that takes into account the needs of all of our learners and reflects the additionality required to ensure parity in the Welsh-medium sector as new places are delivered throughout the proposed WESP.
123. Cardiff's Welsh Education Forum has established a number of working groups to support the drafting and agreement of detailed WESP action plans for implementation by the end of December 2022. This will support timely progress on the commitments set out in Cardiff's WESP.

### **Wellbeing of Future Generations**

124. In line with the Well-being of Future Generations Act Cardiff is committed to providing Local Schools for Local Children, together with encouraging use of sustainable modes to travel to schools, such as walking and cycling. Each School project takes into account key transport issues when they are being designed and the firm need to provide safer routes to encourage walking, cycling and other active travel modes to schools.
125. With the current investments in ICT across the city, student movements may be further reduced as mobile technology develops further allowing for flexible teaching methods. These have the potential to result in a more efficient Travel Plan and further contribute to the Council's targets to reduce its carbon emissions.
126. In order to maximise the long-term impact of this significant investment, any design taken forward for each school included in this proposal would be developed to ensure the delivery of high-quality modern facilities that are able to respond to the current pupil populations needs and support the delivery of effective teaching and learning methods. They would also incorporate the flexibility to take account of changes depending on need as time progresses, such as changing demographics and pupil numbers, changing curriculum and changing types of pupil needs.
127. The project will consult with all statutory bodies when developing a planning application to ensure that environmental and biodiversity impacts are fully considered.

### **Local Member consultation**

128. Local members were consulted during the consultation period. The consultation period for the Complex Learning Needs and Autism Spectrum Condition Provision for learners aged 3-19 ran from 14 December 2021 until 1 February 2022.

## **Reason for Recommendations**

129. To meet increasing demand for Specialist Resource Base and Special School places for primary, secondary and post-16 age learners with complex learning needs and autism.

## **Financial Implications**

130. This report outlines changes to ALN provision and intakes within the schools and SRBs identified. Determination of the recommended proposals does not, in itself commit the Authority to future expenditure. Whilst there are no capital financial implications directly arising from this report, once a final solution has been agreed for each site it will be necessary for a full financial evaluation to be undertaken prior to contractual arrangements being made.
131. The report sets out that future schemes will be funded through the Asset Renewal Capital budget. These schemes will need to be prioritised against other schools' investments required including roof and boiler replacements, health and safety works, and other priority works arising from surveys. If approved these schemes will require tight budgetary control to ensure that other priority schemes are not adversely impacted or delayed.
132. Additional places will need to be funded from the existing delegated school's budget. Previous pre and post consultation reports have highlighted the high-cost provision currently being incurred for this population of pupils either through Out of County Placements or enhanced Complex Needs Enhancement (CNE) payments for mainstream pupils. Projected revenue expenditure on these additional places and associated transport costs is lower than that of Out of County Placements.
133. Regarding delegated revenue budgets, there will need to be a review for each SRB or Special School which has an increase in the number of places. The due diligence undertaken must provide assurance that the additional places will be taken up and that the cost and numbers of Out of County Placements and CNE enhancements will reduce in order to ensure no significant pressure ongoing on school budgets. Over the medium term, regular review and analysis needs to be undertaken comparing the projected number of places available to places taken up. This will ensure that the optimum benefits are achieved by the financial resources used.
134. The proposal for a better spread of provision at special schools and SRBs across the city means that the transport cost per individual learner is likely to decrease. However, projections within the transport implications indicate that the overall impact on home to school transport is likely to increase over the medium term. Schools transport budgets have seen increasing pressure over the last three years and there will be a need for more robust planning to identify increased price or provision alongside additional controls to ensure any changes are affordable within

existing budget allocations where possible. The decision maker needs to consider the likelihood that savings on individual placements and a more effective management of Out of County Placements will be able to cover the additional cost of transporting the increased SRB places.

135. The covering report sets out that the number of places will incrementally grow over the next four years and further work is required to establish the cost / saving for each financial year. For 2022/23, there is a risk that overall spend on Out of County provision and enhanced CNE payments for children and young people with ALN would increase from September 2022, but this pressure can be managed within school delegated budgets. However, the need to ensure robust modelling is in place to ensure that any further pressures are identified and understood prior to implementation and are robustly modelled and factored into medium-term planning is of paramount importance.
136. Regarding capital implications, any further work required to accommodate increased pupil numbers will require full financial evaluation and an identified funding source. These costs will need to be funded from within existing approved resources or factored into future iterations of the Council's Capital Programme. As part of the further evaluation that is required, it will be necessary to consider VAT implications arising from land and property ownership arrangements in relation to Voluntary Aided and Foundation schools. Should there be any cost associated with the required VAT treatment, these will need to be included within the overall financial envelope of the scheme.

### **Legal Implications**

137. The school organisation proposals set out in the report must be considered having regard to the provisions of the School Standards and Organisation (Wales) Act 2013 ('the Act') and the School Organisation Code 2018 ('the Code'). The Code sets out the factors which should be considered in respect of different proposals, the statutory procedures, legal requirements and guidance.
138. The statutory procedures involve a public consultation, publication of a consultation report, statutory notice and a 28 day objection period, prior to determination of the proposals. The previous reports to Cabinet on these proposals are referred to in the body of the report. In March 2022, Cabinet considered the consultation report and resolved to proceed with the proposals and authorised publication of the statutory notice, with the required 28 day objection period (which ended on 5 July 2022).
139. The content of the statutory notice, manner of publication and persons to be notified are prescribed in the Code. Under section 49 of the Act, when objections have been received, the Council must publish a summary of the statutory objections and the Council's response to those objections ("the Objection Report") on its website, and make this available to the interested parties listed in the Code. This Cabinet report constitutes the Objections Report.

140. In respect of proposals for Voluntary Aided and Foundation schools, if no objections are received during the statutory objection period (28 days following publication of the proposals), the governing body may implement its proposals. If, however, objections are received, the governing body must publish a summary of the objections and their responses to those objections (an Objection Report), within 28 days from the end of the statutory objection period, and refer the proposals to the Council for approval under section 51 of the SSOW Act. The Bishop of Llandaff Church in Wales High School has published an Objection Report and has referred its proposals to the Council for determination within the required timescales.
141. The Council must decide whether or not to implement its proposals within 16 weeks from the end of the objection period (under section 53 of the 2013 Act). If the Council fails to determine the proposals within the 16 week period, it is taken to have withdrawn the proposals. When determining its proposals, the Council must be satisfied that the statutory consultation has been conducted and the proposals published in accordance with the Code; and it must conscientiously consider the Objections Report and any responses to the notice supporting the proposals, having regard to the relevant factors set out in the Code.
142. The decision on whether or not to proceed with the proposals must be set out, with reasons having regard to the factors set out in the Code, and issued in the form of a decision letter, published on the Council's website and notified to the Welsh Ministers, the school governing body and all interested parties listed in the Code.
143. If the proposals are taken forward, the admission arrangements for the school, including admission numbers and catchment areas, will need to be determined, following consultation, in accordance with the School Admission Code and the Education (Determination of Admission Arrangements) (Wales) Regulations 2006.
144. In considering this matter, the Council must have regard to its public sector equality duties under the Equality Act 2010 (including specific Welsh public sector duties). This means the Council must give due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The protected characteristics are: age, gender reassignment, sex, race – including ethnic or national origin, colour or nationality, disability, pregnancy and maternity, marriage and civil partnership, sexual orientation, religion or belief – including lack of belief.
145. When taking strategic decisions, the Council also has a statutory duty to have due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage ('the Socio-Economic Duty' imposed under section 1 of the Equality Act 2010). In considering this, the Council must take into account the statutory guidance issued by the Welsh Ministers (WG42004 A More Equal Wales The Socio-economic Duty Equality Act 2010 (gov.wales) and must be able to demonstrate how it has discharged its duty.

## Well Being of Future Generations (Wales) Act 2015

146. The Well-Being of Future Generations (Wales) Act 2015 ('the Act') places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible.
147. In discharging its duties under the Act, the Council has set and published well-being objectives designed to maximise its contribution to achieving the national well-being goals. The well-being objectives are set out in Cardiff's Corporate Plan 2021-24. When exercising its functions, the Council is required to take all reasonable steps to meet its well-being objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the well-being objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.
148. The well-being duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:
- Look to the long term
  - Focus on prevention by understanding the root causes of problems
  - Deliver an integrated approach to achieving the 7 national well-being goals
  - Work in collaboration with others to find shared sustainable solutions
  - Involve people from all sections of the community in the decisions which affect them
149. The decision maker must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible using the link below:

<http://gov.wales/topics/people-and-communities/people/future-generations-act/statutory-guidance/?lang=en>

### General

150. The decision maker should be satisfied that the decision is in accordance and within the financial and budgetary policy.
151. The decision maker should also have regard to, when making its decision, to the Council's wider obligations under the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards.

## **HR Implications**

### **HR implications relevant to the expansion of Meadowbank Special School**

152. The proposed increase in pupil numbers for the school will require the Governing Body to plan for the workforce requirements in readiness for the expansion. The Governing Body would be responsible for amending their staffing structures and for recruitment to reflect the additional places, supported by the Council's HR People Services.
153. The Governing Body will be encouraged to undertake this work in line with the School Organisation Planning HR Framework. HR People Services will provide advice, support and guidance to the Governing Body for the workforce planning and consequential recruitment processes.
154. Where the Governing Body has adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of an increase in the numbers on roll will provide opportunities for school-based staff on the school redeployment register.

### **HR implications relevant to the proposals for the expansion of existing Specialist Resource Base Provision at Marlborough Primary School, Springwood Primary School and The Marion Centre.**

155. HR People Services will work with each Governing Body to address any HR implications arising from the increase in the designated number of the Autism Spectrum Condition Specialist Resource Base at the school and whether there is a need for staff resources. Each of the bases is operating at full capacity at present and is staffed accordingly.
156. Where the Governing Body has adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the increase in the designated number of the Autism Spectrum Condition Specialist Resource Base will provide opportunities for school-based staff on the school redeployment.

## **Property Implications**

157. Strategic Estates continue to work with and support Education colleagues through the asset management process and any property matters relating and arising from proposals. Where there are any property transactions or valuations required to deliver any proposals, they should be done so in accordance with the Council's Asset Management process and in consultation with Strategic Estates and relevant service areas.

## **Traffic & Transport Implications**

158. The Council's Local Development Plan (2006-2026) includes a target of 50% of all journeys to be made by sustainable transport. Minimising the proportion of school journeys made by car and maximising opportunities



for travel to school by active and sustainable modes can make an important contribution to achieving this target and reducing pressures on the transport network at peak times.

159. The Council's current Corporate Plan includes a commitment to every school in Cardiff developing an Active Travel Plan. Such a plan will identify actions by the school to support and encourage active travel to school and also any improvements to on-site and off-site infrastructure required to facilitate active journeys.
160. Increasing travel to school by active modes will have a positive impact on children's health and wellbeing and will support the delivery of key actions and outcomes under Goal 5 the Council's Child Friendly City Strategy (2018), which relates to ensuring access to safe outdoor environments for formal and informal play, walking, cycling and scooting and active travel to school.
161. A number of initiatives have successfully demonstrated support and encouragement for active and sustainable travel amongst the ALN cohort, including Independent Travel Training for older pupils, cycle maintenance and cycle training.
162. Provision of recommended improvements for active travel would benefit these pupils as well as staff and visitors to the sites.
163. The individual needs of pupils at special schools and SRBs, together with greater distances travelled, necessarily limit the scope for high rates of active travel compared with mainstream schools.
164. Transport Assessments or Transport Statements may be required as part of planning applications for new school accommodation (depending on scale of development). These will identify measures to be included as part of the applications to address any potentially adverse impacts, to facilitate access and maximise travel by sustainable modes.
165. As outlined in The Bishop Of Llandaff CiW High School Objection Report attached at Appendix 8, the Council is working closely with the school and a number of potential mitigation measures for existing congestion issues on Rookwood Close and Pwllmelin Road are being considered. These include:
  - Management of the school transport arrival times to avoid unduly long waiting periods;
  - A review of the access gate location and barrier arrangement;
  - A review of the design and layout of the drop-off and pick-up area;
  - A review of coach parking arrangements on Pwllmelin Road to improve visibility; and
  - Consideration of traffic restrictions including parking, loading and unauthorised access restrictions at specific times.
166. The number of pupils who use Learner Transport for their journey to school is likely to increase in line with increasing numbers of pupils

requiring places at special schools or SRBs. Schools with increased demand for Learner Transport vehicles may require suitable improved and / or expanded facilities for drop-off and pick up within the site. The areas required would need to accommodate appropriate numbers of vehicles which may approximate to one taxi for a typical average of 3 pupils. In some cases, minibuses may be suitable, but this is also dependent on individual pupil needs, home locations and co-ordination of routes.

167. Car parking provision would be in line with the Council's parking standards. Allocations for special schools and SRBs are agreed on a case-by-case basis but requirements are expected to generally correlate with 1 car space per typical number of pupils in a class. This is in line with the standard 1 space per 30 pupils in mainstream schools, but results in a higher ratio of spaces due to the much smaller class sizes.
168. The Council applies the statutory qualifying walking distance criteria for pupil to qualify for free home to school transport to special schools and SRBs. Additionally, some learners who live within two / three miles of the school may be provided with free transport due to their individual learning needs and social issues.
169. The existing high numbers of pupils eligible for Learner Transport are not generally expected to change significantly, however a proportion are able to, and may already, travel to school independently. These pupils as well as staff and school visitors would benefit from any required improvements in facilities for active travel to school or public transport facilities.
170. Overall, the costs of home to school transport for the additional places would increase as the proposed changes increase the number of pupils transported from home to specialist provision.
171. The increased provision of places at special schools and SRBs across the city means out-of-county transport spending per learner may reduce or be offset as a result of these proposals. The transport cost per individual learner accessing provision within the city is anticipated to be lower compared to accessing alternative provision some of which may be in other local authority areas.
172. The annual cost to the Council of school transport for learners with Complex Learning Needs/ Autism Spectrum Condition averages c£5,000 per learner. The annual cost to the Council of school transport for learners with Complex Learning Needs/ Autism Spectrum Condition to alternative independent provision is c£10,000 per learner.
173. Taking account of the distribution of the proposed additional places city-wide it is anticipated that the average journey length would reduce.
174. The projected costs of transporting the additional pupils to school, as a result of the proposals in this report, would increase by c£91k per year in 2022/23, by c£78k in 2023/24 and by c£92 in 2024/25 as pupils are

enrolled to the expanded provision, based on average annual costs for learners travelling to the current provision. These costs are based on transporting the additional pupils to Meadowbank School.

175. The number of pupils being transported to Marlborough Primary School, Springwood Primary School and The Marion Centre is not expected to change and transport arrangements are already included within the relevant budget.
176. Should the proposals not proceed, transporting pupils to alternative provision would be significantly higher as the current average costs for learners travelling to this provision is approximately double.
177. It is anticipated that the continued increase in the number of pupils transported to specialist provision, including those arising from these proposals and proposals determined by the Cabinet in July 2022, will incur further costs of c£178k per year for supporting and managing transport. This includes compliance, administration and independent travel training (invest to save).
178. The Council ensures that home to school transport provides an effective and efficient use of the Council's financial resources, in proactive planning for additional transport requirements and reactive adaptation to changing needs where necessary. The following measures ensure that costs are effectively controlled:
  - Routes are continually optimised to make sure that the most appropriate mix and maximum number of pupils are on a route and the route is as short as possible to cut down on any unnecessary costs.
  - Routes are tendered to the open market to make sure that contract rates are as low as possible.
  - Transport Officers work closely with Education colleagues on provision location, projected demand and phasing of provision, as well as working with school staff to ensure all routes have the appropriate mix of pupils on them.
  - Transport staff are involved in the annual review process to identify pupils who can be trained to travel independently to school or identify where Transport Support Allowances are the best option for the pupils needs.

### **Equality Impact Assessment (EqIA)**

179. The EqIA prepared ahead of consultation on proposals has been reviewed to take account of the responses received and any further information made available or secured since the original documents were prepared relevant to the proposal from the Council and/or its partners. No changes were found to be necessary to the document.
180. In the event the proposals proceed to implementation, proposal specific EqIAs will be kept under regular review as part of the planning and delivery process.

181. The Equality Impact Assessment is attached at Appendix 13.

## RECOMMENDATIONS

Cabinet is recommended to

- (i) Approve the proposals in respect of changes to additional learning needs provision as set out in a paragraph 1 of this report without modification
- (ii) Authorise officers to take the appropriate actions to implement the proposals as set out in paragraph 1
- (iii) Approve the proposal as set out in paragraph 2 without modification
- (iv) Authorise officers to take the appropriate actions to implement the proposal as set out in paragraph 2
- (v) Authorise officers to publish the decisions within 7 days of determination of the proposal
- (vi) Delegate authority to the Director of Education & Lifelong Learning (in consultation with the Cabinet Members for Education and Finance, Modernisation & Performance, the Director of Governance and Legal Services, the Director of Economic Development and the Corporate Director for Resources) to determine all aspects of the procurement process (including for the avoidance of doubt development of all procurement documentation and selection and award criteria, commencement of procurement through to award of contracts).
- (vii) To note the publication of a statutory notice in respect of proposals published by the Governing Body of Whitchurch High School to expand its Specialist Resource Base from 70 places to 100 places from September 2022 and future determination of the proposal

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Melanie Godfrey</b> Director of Education & Lifelong Learning
	22 September 2022

*The following appendices are attached:*

Appendix 1: Cabinet Report of 14 October 2021

Appendix 2: Cabinet Report of 10 March 2022

Appendix 3: Statutory Notices (Meadowbank Special School, Marlborough Primary School and Springwood Primary School)

Appendix 4: Consultation document

Appendix 5: The Bishop of Llandaff CiW High School Consultation Report

Appendix 6: Minutes of The Bishop of Llandaff CiW High School Governing Body meeting on 14 June 2022

Appendix 7: Statutory Notice (The Marion Centre, The Bishop of Llandaff Church in Wales High School)  
Appendix 8: The Bishop of Llandaff CiW High School Objection Report  
Appendix 9: Whitchurch High School Consultation Report  
Appendix 10: Statutory Notice (Whitchurch High School)  
Confidential Appendix 11: Summary Financial Modelling – placements costs  
Confidential Appendix 12: Summary Financial Modelling – transport costs  
Appendix 13: Equality Impact Assessment

Mae'r dudalen hon yn wag yn fwriadol

**CABINET MEETING: 10 MARCH 2022**

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**SCHOOL ORGANISATION PROPOSALS: PROVISION FOR CHILDREN AND YOUNG PEOPLE WITH ADDITIONAL LEARNING NEEDS (ALN) - COMPLEX LEARNING NEEDS AND AUTISM SPECTRUM CONDITION PROVISION FOR PRIMARY AND SECONDARY AGED PUPILS**

**EDUCATION, EMPLOYMENT & SKILLS (COUNCILLOR SARAH MERRY)**

**AGENDA ITEM: 7**

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**Reason for this Report**

1. The purpose of this report is to inform Cabinet of the responses received following public consultation on proposals to extend and realign special school and Specialist Resource Bases (SRBs) for pupils across Cardiff with Complex Learning Needs and Autism Spectrum Conditions.
2. The proposals considered in this report relate to maintained community provision. The responses received following public consultation on proposed changes to additional learning needs provision at The Marion Centre at The Bishop of Llandaff High School and to the Specialist Resource Base at Whitchurch High School will be considered by the relevant Governing Body.

**Background**

3. At its meeting on 15 July 2021 the Cabinet authorised officers to consult on proposals for the establishment of Specialist Resource Base provision at Moorland Primary School for learners with complex learning needs from September 2022.
4. At its meeting on 14 October 2021 the Cabinet authorised officers to consult on proposals to:
  - establish a 30 place Specialist Resource Base for learners with complex learning needs at Willows High School from September 2023;

- increase the designated number at the Llanishen High School Specialist Resource Base for learners with Autism Spectrum Condition from 20 to 45 places from September 2022;
  - establish a 30 place Specialist Resource Base at Ysgol Gyfun Gymraeg Glantaf alongside the existing 30 place Specialist Resource Base for learners with Autism Spectrum Condition from September 2023;
  - increase the designated number of Ty Gwyn Special School from 198 to 240 from September 2022;
  - increase the designated number of Meadowbank Special School from 40 to 98 from September 2022;
  - increase the designated number of The Hollies Special School from 90 to 119 from September 2022;
  - further increase the designated number of The Hollies Special School from 119 to 150 from September 2023;
  - increase the designated number at the Specialist Resource Base at Llanishen Fach Primary School for learners with complex learning needs from 20 to 30 places from September 2023;
  - increase the designated number at the Specialist Resource Base at Marlborough Primary School for learners with severe and complex learning needs from 20 to 30 from September 2022;
  - increase the designated number at the Specialist Resource Base at Pentreban Primary School for learners with Autism Spectrum Condition from 20 to 24 spaces from September 2022;
  - increase the designated number at the Specialist Resource Base at Springwood Primary School for learners with Autism Spectrum Condition from 20 to 28 from September 2022.
5. The Cabinet noted the proposal to increase the designated number at The Marion Centre Specialist Resource Base, at The Bishop of Llandaff Church in Wales High School, from 42 to 66 places from September 2022 and instructed officers to provide all reasonable assistance to the Governing Body of the school who would be consulting on the proposal.
  6. The Cabinet also noted that the proposal to increase the designated number at Whitchurch High School Specialist Resource Base from 70 to 100 from September 2022 and instructed officers to provide all reasonable assistance to the Governing Body of the school who would be consulting on the proposal.



## Issues

7. The consultation period for proposals to establish a Specialist Resource Base at Moorland Primary School ran from 11 October 2021 until 17 January 2022.
8. The consultation period for proposals to expand Complex Learning Needs and Autism Spectrum Condition Specialist Resource Base provision for learners aged 11-19 ran from 14 December 2021 until 01 February 2022.
9. The consultation period for proposals to expand Complex Learning Needs and Autism Spectrum Condition provision for learners in primary and all-through (age 3-19) provision also ran from 14 December 2021 until 01 February 2022.
10. The consultation process for all proposals involved:
  - Publication of bilingual consultation documents outlining background, rationale and implications to parents, staff and governors of affected schools, Headteachers and Chairs of Governors city-wide, elected Members, local residents and other stakeholders (a copy of the consultation documents can be seen at Appendix 1);
  - publication of bilingual summary documents setting out the main points of the consultation documents (a copy of the summary documents can be seen at Appendix 2);
  - publication of information in community languages upon request;
  - Consultation meetings via Microsoft Teams with governors and staff at Moorland Primary School, Willows High School, Llanishen High School, Ysgol Gyfun Gymraeg Glantaf, Ty Gwyn Special School, Meadowbank Special School, The Hollies Special School, Llanishen Fach Primary School, Pentreban Primary School and Springwood Primary School (notes from the meetings can be seen at Appendix 3);
  - consultation meetings via Microsoft Teams/in person with pupil representatives at Moorland Primary School, Willows High School, Llanishen High School, Ysgol Gyfun Gymraeg Glantaf, Meadowbank Special School, Llanishen Fach Primary School and Springwood Primary School (notes from these meetings can be seen at Appendix 4);
  - The Hollies Special School facilitated consultation with their pupils and provided details of the views gathered (details can be seen at Appendix 4);
  - the pupil consultations that took place in person were conducted in line with the relevant Health and Safety guidance;
  - Public consultation meetings via Microsoft Teams at which the proposals were explained and questions answered (notes from the meetings can be seen at Appendix 5);

- drop-in sessions were offered via Microsoft Teams where officers were available to answer questions (there were no requests for drop-in sessions);
  - letters setting out details of the proposals and where further information could be found were sent to local residents and businesses in the areas surrounding the school sites subject to the proposed changes;
  - a communication campaign via social media;
  - a consultation response slip for return by post or e-mail, attached to the consultation documents and summary documents;
  - an online response from at [www.cardiff.gov.uk/ALNSchoolproposals](http://www.cardiff.gov.uk/ALNSchoolproposals)
11. For stakeholders who did not have access to digital platforms the opportunity to discuss the proposed changes via telephone was available.
  12. The views expressed at Council organised meetings, drop-in sessions, telephone calls, and on paper or electronically through the appropriate channels, have been recorded.
  13. Views were sought from interested stakeholders via an online survey and a hard copy version of the survey within the consultation document.
  14. The details presented in this report represent the views expressed during the consultation process. These include the wider stakeholder survey, formal responses, e-mail responses, views expressed at public meetings, drop-in sessions, telephone calls and pupil consultation meetings.
  15. The views expressed in the wider stakeholder surveys reflect those raised in the e-mail responses received.

**Responses received to the consultation on the proposed establishment of Specialist Resource Base provision at Moorland Primary School**

16. The consultation on the proposed establishment of a Specialist Resource Base at Moorland Primary School was undertaken jointly with a proposal for the proposed expansion and transfer of The Court Special School.
17. The responses received to the consultation included expressions of support and concerns relevant to both proposals.
18. In total there were 38 responses including 35 online responses and 3 e-mail responses to the Moorland Primary School proposal.
19. Formal responses were received from:
  - Estyn
  - Moorland Primary School Governing Body
  - Moorland Primary School Headteacher
20. The response from Estyn set out its view that the proposal is likely to at least maintain the standard of education provision in the area.

21. Of the 35 online responses received 74.3% supported the proposal to establish a Specialist Resource Base provision at Moorland Primary School.
22. Full copies of the formal responses can be seen at Appendix 6.
23. A summary of the responses received from all stakeholders, and an appraisal of views expressed, can be seen at Appendix 7.
24. A summary analysis of the responses received are included at Appendix 8.

### **Views expressed**

25. Reasons for supporting the proposed changes included:
  - Recognition of the need to increase the number of additional learning needs places available.
  - The establishment of a Specialist Resource Base at the school would be a positive addition to this area of Cardiff.
  - The proposed change would help to reduce travel times for children.
26. Whilst there was support for the establishment of Specialist Resource Base provision at the school there were a number of concerns related to:
  - The completion of Key Stage 2 and Foundation Phase building works prior to children being admitted in order to avoid the need for children to have two learning environment moves.
  - The availability of funding in a timely manner to allow for staff recruitment.
  - Assurances that funding for the additional places at the resource base and other associated costs are 'ringfenced' in addition to the allocated school budget.
  - The need for improved pedestrian access to the school and traffic management measures.
  - The space available at the school for outdoor provision.

### **Moorland Primary School Pupil representation**

27. Officers met virtually via Microsoft Teams with Years 5 pupils at Moorland Primary School to discuss the proposals and gather their opinions.
28. The points raised by the pupils included the following:
  - It would allow more children to come to Moorland.
  - More children will have access to a good education.
  - Children with additional needs can get the specialist help that they need.
  - Children will have the chance to mix and play with other children and have more learning opportunities.

- Children with additional learning needs should have the same opportunities that the children in Moorland have.
- Good to have the chance to meet more people and make more friends.
- Excited to see what the new yard will look like.
- Even though the yard might be getting smaller it is exciting to have more children coming to the school.
- Everybody in the class is kind and would like to meet the new children and make them feel welcome.
- Will give children an opportunity to learn more about children with additional needs.

29. The pupils had concerns relating to:

- Where the nursery children will go when their building is knocked down, and whether it will affect the rest of the school.
- If there are more children on the playground and the playground is getting smaller, could there be more injuries?
- Some younger children being with older children might not be a good idea.
- Worried that if there are more children there would be more cars coming to the site, traffic and parking issues.
- What will happen with breaktimes during the building work; will it affect pupil's playtimes?
- If there are lots more children coming to the school, will it make the school too busy when arriving and leaving?
- Construction noise might affect the pupils' learning.
- How long will the build take?

### **Response to views expressed**

30. The Council welcomes the expressions of support for the establishment of Specialist Resource Base provision at Moorland Primary School.
31. It is however acknowledged that there are a number of concerns raised particularly in relation to the completion of building works, funding, staffing and traffic in and around the school site.
32. Following discussions with the school it has been agreed that, subject to the proposal to establish Specialist Resource Base provision at the school being determined to proceed, the proposed start date for the new provision would be deferred to September 2023. This would allow sufficient time for the necessary building works to be completed and for suitable staffing arrangements to be progressed.
33. Funding for Specialist Resource Base placements is provided separately from mainstream funding.
34. The Council has extensive experience of progressing construction work on occupied school sites and will work closely with the school to minimise

any impacts on teaching and learning and play during the construction phase to ensure that standards are maintained. The Council is also considering an opportunity to utilise the old Glan Morfa School site as potential outside space during construction works to help mitigate pressures.

35. The proposals will include measures already identified by a Transport Statement to maximise active and sustainable travel to improve conditions for pedestrians near the school.
36. Some pupils in the Specialist Resource Base would qualify for free home to school transport and facilities for drop-off would be provided for this small number of vehicles.
37. A review of parking and loading restrictions and the provision of a School Street on both of the adjacent streets would improve safety by discouraging access by other vehicles and reducing congestion, parking and safety issues.
38. Further measures to encourage pedestrian and other active travel access will be provided with improvements to footways, crossings and access through the park.
39. A full appraisal of the views expressed can be seen at Appendix 7.

**Responses received to the consultation on the proposed expansion of Complex Learning Needs and Autism Spectrum Condition Specialist Resource Base provision for learners aged 11-19**

40. In total 114 responses were received including 106 online response and a further 8 e-mail responses regarding the specific proposals consulted on.
41. Formal responses were received from:
  - Estyn
  - Willows High School Governing Body
  - Llanishen High School Governing Body
  - Ysgol Gyfun Gymraeg Glantaf Headteacher and Governing Body
42. In addition to these responses, a further 17 responses were received during the consultation period that did not comment directly on the proposals consulted on but commented on the need for an increase in additional learning needs provision overall, particularly in the Welsh-medium sector.
43. Estyn welcomed the proposals which sits alongside others and aims to achieve a more equitable provision to better match current and future learning needs of pupils, across the City.
44. The response from Estyn sets out its view that the proposals are likely to, at least, maintain the standard of education provision in the area.

45. Full copies of the formal responses can be seen at Appendix 6.
46. The responses received overall expressed support for the proposals put forward to improve provision for children and young people with additional learning needs. Of the 101 respondents to the online survey who answered the question, 96% supported the proposed changes.
47. A recognition of the need to increase additional learning needs provision was common response across all proposals. Concerns related to funding, accommodation, traffic and the need to develop Welsh-medium additional learning needs provision were also common across all proposals.
48. A summary of the responses received from all stakeholders, and appraisal of views expressed, can be seen at Appendix 7.
49. A summary analysis of the responses received can be seen at Appendix 8.

### **Willows High School**

50. In total there were 86 responses including 84 online responses and two e-mail responses. Of the 84 online responses, 86.9% supported the proposal to establish a 30 place Specialist Resource Base at the school for learners with complex learning needs from September 2023.
51. Reasons for supporting the proposed changes included:
  - Recognition of the need for increased additional learning needs provision.
  - Provision needed more local to the area.
52. Whilst there was support for the establishment of Specialist Resource Base provision at the school there were a number of concerns related to:
  - Clarification on ring fenced funding for the Specialist Resource Base provision.
  - The provision would be best introduced as part of the new Willows buildings as, despite the published admission number, there is insufficient space in the school.

### **Willows High School Pupil representation**

53. Officers met with pupils at Willows High School to discuss the proposals and gather their opinions.
54. The pupils supported the establishment of Specialist Resource Base provision at the school.
55. The points raised related to access to the building and that it would be a good idea for the resource base provision to be located on the ground

floor. The canteen was busy at lunchtime, and it was suggested that lunchtimes could be staggered to avoid crowds.

56. The pupils felt it would be useful for the wider school community to have some general information regarding the provision to help their understanding of needs which would support the integration of pupils from the resource base into the school.
57. It was suggested that children from the resource base should join smaller mainstream classes where appropriate as they felt larger classes may be overwhelming if not used to them.

### **Response to views expressed**

58. The Council welcomes the expressions of support for the establishment of Specialist Resource Base provision at Willows High School.
59. It is however acknowledged that there are a number of concerns raised regarding funding, the available accommodation facilities and the need for a wider understanding of the resource base across the wider school community.
60. The Specialist Resource Base would be fully funded and separate from mainstream funding which would be protected.
61. The Council will work closely with the school to identify suitable accommodation for the Specialist Resource Base. Admissions to the base by the Council would be phased, and the school would not therefore require accommodation for 30 learners at the time of implementation.
62. If the proposal proceeds to implementation, the Council would work with the school to develop a better understanding of the Specialist Resource Base provision across the wider school community.
63. The proposed implementation date of September 2023 allows sufficient time to identify accommodation and to undertake any necessary adaptation. However, if the Council and Governing Body are unable to progress the Specialist Resource Base, the retention of the proposed implementation date of September 2023 would afford the Council the flexibility to defer admission of pupils to the base to a later date if this is considered necessary.
64. A full appraisal of the views expressed can be seen at Appendix 7.

### **Llanishen High School**

65. In total there were 84 responses including 83 online responses and 1 e-mail response. Of the 83 online responses, 88% supported the proposal to increase the designated number of the Specialist Resource Base at Llanishen High School for learners Autistic Spectrum Condition from 20 to 45 places from September 2022.

66. Reasons for supporting the proposed changes included:
- Recognition of the need for increased additional learning needs provision.
67. Whilst there was support for the increase in the designated number at the Llanishen High School Specialist Resource Base for learners with Autism Spectrum Condition there were a number of concerns related to:
- The impact of increased traffic on the drop off and pick up area and the knock-on effect on on-site parking.
  - The need for the school transport and forecourt area to be redesigned.

### **Llanishen High School Pupil representation**

68. Officers met virtually with pupils at Llanishen High School to discuss the proposals and gather their opinions.
69. The existing Specialist Resource Base provision was integrated into the wider school community and the pupils supported this provision being expanded.
70. The points raised related to the accommodation facilities and resources available for the Specialist Resource Base e.g., the size of classrooms and staffing levels. There is a need to ensure that these are appropriate and do not impede the provision offered and the quality of teaching and learning.
71. The pupils felt it would be useful for the wider school community to have greater knowledge of the resource base and the needs of the pupils who use it, as this would mean that they could be more supportive and maybe help them.

### **Response to views expressed**

72. The Council welcomes the expressions of support for the expansion of Specialist Resource Base provision at Llanishen High School.
73. It is however acknowledged that there are of concerns raised in relation to traffic management in and around the school site, the resourcing of the specialist provision and the need for a wider understanding of the resource base across the wider school community.
74. Funding for specialist resource bases is provided separately from mainstream funding. The Council will work with the school to ensure that that the Specialist Resource Base is sufficiently resourced.
75. If the proposal proceeds to implementation the Council would work with the school to develop a better understanding of the Specialist Resource Base provision across the wider school community.



76. With the potential increased demand for Learner Transport for Specialist Resource Base pupils, the site would be reviewed to ensure suitable and sufficient facilities for drop-off and pick-up are provided within the site to accommodate the appropriate numbers of vehicles and improvements made if necessary. Modifications may also be needed to the school access.
77. A full appraisal of the views expressed can be seen at Appendix 7.

### **Ysgol Gyfun Gymraeg Glantaf**

78. In total there were 98 responses including 97 online responses and 1 e-mail response. Of the 97 online responses received, 92.8% supported the proposal to establish a 30-place Specialist Resource Base for learners with Autistic Spectrum Condition alongside the existing 30 place Specialist Resource Base from September 2023.
79. Reasons for supporting the proposed changes included:
- Recognition of the need for increased Welsh-medium additional learning needs provision.
  - Promotes inclusion, care and ambition for pupils and families who face complex and practical challenges.
  - The base will be a great extension within the school community, provide a focus for staff training and be able to support pupils to continue to grow and feel welcome within the mainstream school.
80. Whilst there was support for the establishment of an additional Specialist Resource Base for learners with Autism Spectrum Condition alongside the existing Specialist Resource Base for learners with complex learning needs at the school, there were a number of concerns related to:
- The need to ensure appropriate accommodation (internal and external) is available for learners within the Specialist Resource Bases.
  - The capacity of existing school buildings and the need to minimise any negative impact on mainstream capacity.
  - The potential impact of increased traffic around the school site.
  - The need to address the lack of Welsh-medium provision at primary level which may result in learners leaving the Welsh-medium sector in the early years.
  - The need to address the lack of Welsh-medium provision for the wide range of additional learning needs including emotional health and wellbeing.

### **Ysgol Gyfun Gymraeg Glantaf Pupil representation**

81. Officers met separately with mainstream pupils and pupils from the existing Specialist Resource Base at Ysgol Gyfun Gymraeg Glantaf to discuss the proposals and gather their opinions.

82. The mainstream pupils supported the establishment of an additional Specialist Resource Base at the school.
83. The points raised related to improved access to Welsh-medium education for children with additional learning needs, Specialist Resource Base pupils being able to benefit from access to school facilities e.g., the playing field, the opportunity for better facilities for pupils attending the existing Specialist Resource Base and pupils being able to be part of a mainstream school.
84. The pupils did not have concerns around increased traffic. The school was already busy, and they didn't think that an additional 30 pupils would make much difference but agreed that there could be some impact. Pupils were of the view that the existing Specialist Resource Base was in the wrong place meaning they lost access to some important school resources.
85. The current Specialist Resource Base pupils supported the establishment of an additional Resource Base at the school.
86. They felt positively about the opportunities and support they have at the school e.g., lessons, teachers and staff, work experience and agreed that this would be good to share with other pupils.
87. They would like to see new facilities for both Specialist Resource Bases including an outside area, a garden area, wildlife habitats, new classrooms to allow for more pupils, quiet areas/spaces, improved Wi-Fi and better IT to support extended pieces of work and a kitchen area. They would also like to see a welcome/café area like the one in the entrance of the main school, a sensory room and better toilet and changing facilities.
88. They said it would be good to have more pupils for sports teams e.g., rugby and more pupils to do activities with.

### **Response to the view expressed**

89. The Council welcomes the expressions of support for the establishment of the additional Specialist Resource Base provision at Ysgol Gyfun Gymraeg Glantaf.
90. It is however acknowledged that there are a number of concerns raised particularly in relation to the accommodation facilities, the potential for increased traffic and the availability of Welsh-medium additional learning needs provision.
91. Discussions are ongoing with the school regarding the provision of new build accommodation for the existing Specialist Resource Base provision at the school and the proposed additional Specialist Resource Base provision.

92. With the expected increase in demand for Learner Transport, the existing facilities for drop-off and pick-up will be reviewed to confirm they are suitable to accommodate the appropriate numbers of vehicles.
93. The wider development of Welsh-medium additional learning needs provision is being considered and proposals will be brought forward as part of the implementation of the Council's Welsh in Education Strategic Plan following agreement of the strategy by the Welsh Government and formal adoption.
94. A full appraisal of the views expressed can be seen at Appendix 7.

**Responses received to the consultation on the expansion of Complex Learning Needs and Autism Spectrum Condition provision for learners in primary and all-through (age 3-19) provision**

95. In total, 109 responses were received including 92 responses to the online survey, and a further 17 e-mail responses regarding the specific proposals consulted on.
96. Formal responses were received from:
  - Estyn
  - Governing Body of the Western Learning Federation
  - Ty Gwyn Special School Headteacher
  - Meadowbank Special School Governing Body
  - Meadowbank Special School Chair of Governors
  - Meadowbank Special School Staff
  - The Hollies Governing Body
  - Llanishen Fach Primary School Staff
  - Marlborough Primary School
  - Springwood Primary School Governing Body and Staff
  - Pentreban Primary School (a response from the school is being sought)
97. In addition to these responses, a further 16 responses were received during the consultation period, that did not comment directly on the proposals consulted on but commented on the need for an increase in additional learning needs provision overall, particularly in the Welsh-medium sector.
98. The response from Estyn sets out its view that the proposals are likely to at least maintain the standard of education provision in the area.
99. Full copies of the formal responses can be seen at Appendix 6.
100. The responses received overall expressed support for the proposals put forward to improve provision for children and young people with additional learning needs. Of the 91 respondents to the online survey who answered the question, 90.1% supported the proposed changes.

101. A recognition of the need to increase additional learning needs provision was common across all proposals. Concerns related to funding, accommodation, staff recruitment, professional development and retention, traffic and the need to develop Welsh-medium additional learning needs provision were also common across all proposals.
102. A summary of the responses received from all stakeholders, and appraisal of views expressed, can be seen at Appendix 7.
103. A summary analysis of the responses received are included in Appendix 8

### **Ty Gwyn Special School**

104. In total there were 85 responses including 80 online responses and 5 e-mail responses. Of the 80 online responses, 88.8% supported the proposal to increase the designated number of Ty Gwyn Special School from 198 to 240 places from September 2022.
105. Reasons for supporting the proposed change include:
  - Recognition of the need for increased additional learning needs provision.
  - Welcome the opportunity for more children to be able to access high quality provision at the school.
106. Whilst there was support for the proposal of increasing the number of places at Ty Gwyn Special School, there were a number of concerns related to:
  - The additional accommodation requirements arising out of proposed changes e.g., the need for sufficient breakout spaces to support behaviour management.
  - The requirement for a robust audit of current provision to provide clarity on demand and evidence for what support would be needed in the event of the increased pupil numbers.
  - Pupil funding and how the average pupil funding will be increased in order to meet the level of need.
  - The need to be able to invest in staff to ensure appropriate levels of training and support.
  - The need to ensure the level of Health provision is proportionate to the needs of pupils e.g., nursing, occupational therapist and physiotherapist provision.
  - The availability of out of term time play provision for pupils with a high level of need.
  - The need to maintain small class sizes to allow for staff to support pupils to develop and meet their full potential.
  - Traffic Management.

## **Ty Gwyn Special School Pupil representation**

107. Officers offered the opportunity to Ty Gwyn School to meet with pupil representatives during the consultation period, to discuss the proposals and gather their opinions. The school agreed that its staff would facilitate a session appropriate to the needs of its learners using communication aids and symbols and reported a majority support for the changes described.

### **Response to the view expressed**

108. The Council welcomes the expressions of support for the expansion of Ty Gwyn Special School.
109. It is however acknowledged that there are a number of concerns raised particularly in relation to the accommodation facilities, the requirement for an audit of existing provision, funding, staffing and health provision.
110. The Council continues to work with the Governing Body to ensure that suitable accommodation is provided for the increase in the number of pupils including the provision of additional classrooms, offices and Adult Services areas at the old Trelai Youth Centre.
111. An audit of current provision will be carried out with the school which will include consideration of class sizes. There are no plans to exceed the capacity beyond the current proposal. Admissions to the school by the Council would be phased, to support the sustainable growth of the school.
112. The Council will continue to monitor demand for additional learning needs and bring forward proposals as required.
113. The Council is continuing to work with the Governing Body and the Health Board to ensure there is an appropriate level of health provision available to meet the needs of pupils.
114. The availability of out of term time play provision is outside of the scope of the proposal consulted on and will be considered separately.
115. A full appraisal of the views expressed can be seen at Appendix 7.

### **Meadowbank Special School**

116. In total there were 85 responses including 82 online responses and 3 e-mail responses. Of the 82 online responses, 90.2% supported the proposal to increase the designated number of Meadowbank Special School from 40 to 98 places from September 2022.
117. Reasons for supporting the proposed change include:
- Recognition of the need for increased additional learning needs provision.

118. Whilst there was support for the proposal to increase provision at Meadowbank Special School, there were a number of concerns related to:

- The need to phase the increase in pupil numbers to allow sufficient time for all the necessary planning around accommodation, staffing and maintaining the collaborative ethos of the school to be put in place.
- The need to ensure that there are sufficient resources available to support the proposed changes.
- The likelihood of additional places being needed beyond what is being proposed.
- Potential impact on existing class sizes; will the number of pupils in classes increase or will there be additional classes.
- Disappointment that the Early Years Outreach Provision had not been considered for expansion.
- The need for detailed projected planning and regular engagement with the school.
- The need to ensure the level of Health provision is proportionate to the needs of pupils e.g., onsite health professionals who can attend to the needs of pupils.

### **Meadowbank Special School Pupil representation**

119. Officers met virtually via Microsoft Teams with Years 4, 5 and 6 and a number of teachers at Meadowbank Special School to discuss the proposals and gather their opinions.

120. The points raised by the pupils included the following:

- Very happy, proposal is a good idea.
- Looking forward to making new friends.
- Want more children to play with.
- Desire for playground space, scooters, bikes, more friends, spider swing, slide, pool, retain existing trees on site.

121. The pupils had concerns relating to:

- Whether teachers will be able to take care of additional pupils.
- About getting on with new teachers.
- Lack of space for new pupils.
- Running out of pupils after year six pupils leave.
- Are there going to be more toilets?
- Where would new pupils go?
- How would new building be connected to current?
- How will new children be fed?
- Concerned about noise.
- Where will new children have lunch if current lunch hall is too small?
- How long will it take?
- More teachers are needed.

- Lack of space for parking.
- How food will be transported from new building to dinner hall.

### **Response to the views expressed**

122. The Council welcomes the expressions of support for the expansion of Meadowbank Special School.
123. It is however acknowledged that there are a number of concerns raised particularly in relation to the accommodation facilities, funding, health provision and transition arrangements.
124. If the proposal is agreed to proceed the Council would work with the Governing Body to ensure that suitable accommodation is provided for the increase in the number of pupils including detailed projected planning and regular engagement with the school.
125. The Council is continuing to work with the Governing Body and the Health Board to ensure there is an appropriate level of health provision available to meet the needs of pupils.
126. The Council is continuing to work with special schools to develop outreach provision with mainstream schools.
127. There are no plans to exceed the capacity of the school beyond the current proposal. Admissions to the school by the Council would be phased, to support the sustainable growth of the school. The Council will continue to monitor demand for additional learning needs and bring forward proposals as required.
128. The availability of out of term time play provision is outside of the scope of the proposal consulted on and will be considered separately.
129. With the expected increase in demand for Learner Transport, the site would be reviewed to ensure suitable and sufficient facilities for drop-off and pick-up are provided within the site to accommodate the appropriate numbers of vehicles and improvements made if necessary.
130. Options to be explored are likely to include modifications which may be require changes to the school access with additional parking restrictions opposite the entrance to provide unobstructed access.
131. The proposal may require a Transport Statement which would identify measures to be included to maximise travel by sustainable modes. The Active Travel Plan for the school would also identify actions by the school and also any improvements to on-site infrastructure required to support, encourage and facilitate active travel to school.
132. A full appraisal of the views expressed can be seen at Appendix 7.

## **The Hollies Special School**

133. In total there were 80 responses including 78 online responses and 2 e-mail responses. Of the 80 online responses, 91.1% supported the proposal to increase the designated number of The Hollies Special School from 98 to 150 (with a phased expansion to 119 places from September 2022 and a further expansion to 150 places from September 2023).
134. Reasons for supporting the proposed changes include:
- Recognition of the need for increased additional learning needs provision.
  - The proposal would help to address demand for specialist provision across the Local Authority and would provide the opportunity for access to a suitable and fit for purpose environment for both pupils and staff.
  - Improvements to modernise the school building are welcome and long overdue.
135. Whilst there was support for the proposal to increase provision at The Hollies Special School, there were a number of concerns related to:
- The potential impact on existing pupils e.g., space, shared resources, staffing.
  - The school was set up for 80 pupils but currently has 117 children on roll and investment in the facilities is needed before any further pupils are admitted.
  - There is a need for a strategic and planned approach to the proposed increase in pupil numbers which would need to be phased to allow time for improvements to the building and the recruitment of staff.
  - Safeguarding issues relating to the increase in traffic on the school site would need to be addressed.

## **The Hollies Special School Pupil representation**

136. The school facilitated the pupil consultation with several members of the School Council who discussed the proposed changes to the Hollies School regarding increasing the number of pupils to 150.
137. The pupils discussed the need for more and bigger classrooms as well as the need for more tables and chairs for the pupils. One pupil commented that the school would need more staff for the extra pupils.
138. They were asked if they had any questions about the changes. They asked if they could have more things to play with (share) outside for the extra pupils. They asked if it would mean more cars in the car park and whether the car park be larger.
139. Overall, they thought it was a good idea. They said that they would have more friends to play with but also said that this could mean that the school would be more noisy and busy with extra pupils.



## **Response to the views expressed**

140. The Council welcomes the expressions of support for the expansion of The Hollies Special School.
141. It is however acknowledged that there are a number of concerns raised particularly in relation to the potential impact on existing pupils and staff, accommodation facilities, future capacity and traffic management.
142. If the proposal is agreed to proceed the Council would work with the Governing Body to ensure that suitable accommodation is provided for the increase in the number of pupils. The school would benefit from new and improved facilities which would offset any potential impacts on pupils and staff.
143. There are no plans to exceed the capacity beyond the current proposal. Admissions to the school by the Council would be phased, to support the sustainable growth of the school in the accommodation available. The Council will continue to monitor demand for additional learning needs and bring forward proposals as required.
144. With the expected increase in demand for Learner Transport, the site would be reviewed to ensure suitable and sufficient facilities for drop-off and pick-up are provided within the site to accommodate the appropriate numbers of vehicles and improvements made if necessary.
145. Options to be considered include modifications to the school access and a re-arranged layout to accommodate increasing numbers and also address any safeguarding concerns.
146. A full appraisal of the views expressed can be seen at Appendix 7.

## **Llanishen Fach Primary School**

147. In total there were 79 responses including 78 online responses and one e-mail response. Of the 79 online responses, 91% supported the proposal to increase the designated number of the Llanishen Fach Primary School Specialist Resource Base from 20 to 30 places from September 2023.
148. Reasons for supporting the proposed changes include:
  - Recognition of the need for increased additional learning needs provision.
  - The specialist resource provision at the school benefits all learners and the school would welcome more children being able to access the provision.
  - Opportunity to build upon and improve existing provision and further develop the inclusive nature of the school.

149. Whilst there was support for the proposal to increase provision at Llanishen Fach Primary School, there were a number of concerns related to:
- The need for appropriate facilities to accommodate the resource base provision.
  - The need to minimise any disruption to education particularly within the context of the ongoing circumstances related to Covid-19.
  - The likelihood of additional places being needed beyond what is being proposed.
  - There needs to be more options available for additional learning needs education e.g., EOTAS, self-directed learning, forest school.

### **Llanishen Fach Primary School Pupil representation**

150. Officers met virtually with pupil representatives from Llanishen Fach Primary School to discuss the proposals and gather their opinions.
151. The pupils were supportive of the Specialist Resource Base provision being expanded and thought it was a good idea for more children to have the opportunity to come to the school.
152. The points raised by the pupils related to the accommodation (internal and external) for the Specialist Resource Base, arrangement in the dinner hall, toilet provision and the impact on the school while building work is happening.

### **Response to the views expressed**

153. The Council welcomes the expressions of support for the expansion of the Specialist Resource Base provision at Llanishen Fach Primary School.
154. It is however acknowledged that there are a number of concerns raised particularly in relation to accommodation facilities, potential disruption, and future capacity and the types of provision available.
155. If the proposal is agreed to proceed the Council would work with the Governing Body to ensure that suitable accommodation is provided for the increase in the number of pupils.
156. The Council has extensive experience of progressing construction work on occupied school sites and will work closely with the school to minimise any impacts during the construction phase.
157. There are currently no plans to exceed the capacity beyond the current proposal. The Council will continue to monitor demand for additional learning needs and bring forward proposals as required.
158. A full appraisal of the views expressed can be seen at Appendix 7.

## **Marlborough Primary School**

159. In total there were 78 responses including 77 online responses and one e-mail response. Of the 77 online responses, 90.9% supported the proposal to increase the designated number of the Marlborough Primary School Specialist Resource Base from 20 to 30 places from September 2022.
160. The school declined the opportunity for officers to meet with the Governing Body, staff and pupils.
161. In the absence of the Headteacher, the Deputy Headteacher advised on behalf of the Governing Body and School that the school are very happy with the work that has already been completed at Marlborough and feel that there is no need for consultation as the building work is complete and the children are already able to attend.
162. There were no further comments made.

## **Response to the views expressed**

163. The Council welcomes the Marlborough Primary School response.

## **Pentrebane Primary School**

164. In total there were 77 responses including 77 online responses. Of the 77 online responses, 89.6% supported the proposal to increase the designated number of the of the Pentrebane Primary School Specialist Resource Base from 20 to 24 places from September 2022.
165. The school declined the opportunity for officers to meet with the Governing Body and staff.
166. Reasons for supporting the proposed changes include:
- Recognition of the need for increased additional learning needs provision.
167. Whilst there was support for the proposal to increase provision at Pentrebane Primary School, there were a number of concerns related to:
- Inadequate space for children already at the school and the Specialist Resource Base. The existing facilities need to be improved.
  - A need to develop further provision at other schools e.g., autism provision.

## **Pentrebane Primary School Pupil representation**

168. Officers arranged with Pentrebane Primary School to meet with pupil representatives from the school during the consultation period to discuss

the proposals and gather their opinions. However, due to staffing issues arising from Covid-19, the school postponed the sessions arranged and was unable to facilitate a session in-person or online during the consultation period.

### **Response to the views expressed**

169. The Council welcomes the expressions of support for the expansion of the Specialist Resource Base provision at Pentreban Primary School.
170. It is however acknowledged that there are a number of concerns raised particularly in relation to accommodation facilities for additional provision at the school.
171. If the proposal is agreed to proceed the Council would work with the Governing Body to ensure that suitable accommodation is provided for the increase in the number of pupils.
172. The Council will continue to monitor demand for additional learning needs and bring forward proposals as required.
173. A full appraisal of the views expressed can be seen at Appendix 7.

### **Springwood Primary School**

174. In total there were 77 responses including 76 online responses and one e-mail response. Of the 76 online responses, 90.8% supported the proposal to increase the capacity of the Springwood Primary School Specialist Resource Base from 20 to 28 places from September 2022.
175. Reasons for supporting the proposed changes include:
  - Recognition of the need for increased additional learning needs provision and welcome the proposal.
  - The proposal fits with the school ethos of supporting all children.
  - Welcome further funding to improve the Specialist Resource Base accommodation (internal and external) which will allow the school to provide the best environment for the children to learn and thrive.

### **Springwood Primary School Pupil representation**

176. Officers met virtually with a group of pupils at Springwood Primary School to discuss the proposals and gather their opinions.
177. The points raised by the pupils included querying where new pupils would be accommodated, whether more staff would be required, whether another classroom would be required and whether there will be enough places.

## **Response to views expressed**

178. The Council welcomes the expressions of support for the expansion of the Specialist Resource Base provision at Springwood Primary School.
179. A full appraisal of the views expressed can be seen at Appendix 7.

## **Formal responses received during the consultation regarding Additional Learning Needs Provision**

180. In addition to the responses received regarding the individual proposals consulted on, formal responses regarding the overall provision for children and young adults with additional learning needs were received from:
- Ysgol Glan Morfa Headteacher and Governing Body
  - Ysgol Melin Gruffydd Governing Body
  - Ysgol Glan Ceubal Governing Body
  - Ysgol Pencae Governing Body
  - Ysgol Pwll Coch Governing Body
  - Ysgol y Berllan Deg Governing Body
  - Ysgol Gwaeold y Garth Governing Body
  - Ysgol Nant Caerau Governing Body
  - Ysgol Pen y Gores Governing Body
  - Creigiau Primary School Governing Body
  - Ysgol Mynydd Bychan Governing Body
  - Ysgol Treganna Governing Body
  - Ysgol Coed y Gof Governing Body
  - Ysgol Gyfun Gymraeg Plasmawr School and Governing Body
  - Cardiff Governors Association
  - Merched y Wawr
181. The responses from the Welsh-medium schools contained largely consistent content and are summarised below.
182. Schools acknowledge and welcome the proposals to increase capacity for the English-medium sector and fully support the provision for the most vulnerable pupils in our communities. However, there was a strong feeling that there is a lack of additional learning needs provision within the Welsh-medium sector and a disappointment that more changes were not proposed as part of this consultation.
183. Furthermore, the view was expressed that this consultation contradicts the recent WESP consultation which noted the Council's ambition to open three specialist units in Welsh-medium schools in the Primary sector and a further three Specialist Resource Bases in the Secondary sector
184. Concerns were outlined that by limiting the investment to one sector it encourages families to transfer ALN pupils to leave the Welsh-medium sector and move to English-medium schools where the investment and resources are currently viewed as being superior and better able to meet more complex or higher levels of need.

185. Investment is needed within the Welsh-medium sector in order to ensure parity of provision and full inclusion within Welsh-medium schools.
186. The documentation recognises a clear growing need within the English-medium sector but not in the Welsh-medium with concerns expressed as to whether the research been sufficient to accurately reflect need presenting in Welsh-medium schools.
187. Concerns were also expressed that there is a lack of clear provision in terms of emotional health and well-being and behavior within the Welsh-medium sector for pupils at Stage 4-5 (who have needs beyond mainstream provision) along with a lack of space to establish nurture/wellbeing classes.
188. There was consistent view across the majority of the responses submitted by the Welsh-medium schools that there is a definite need for a greater number of Welsh-medium ALN places and that this is rising. In order to respond to this effectively there was a call for strategic and holistic planning which puts the children and families at the heart of all that we do consistent with our collective commitment to the UNCRC and FGWBA with other corporate goals such as One Planet Cardiff, Cardiff 2030 and Child Friendly City status.

### **Response to views expressed**

189. The Council welcomes the expressions of support for the expansion of additional learning needs provision for children and young people city wide.
190. Following engagement sessions with members of Cardiff's Welsh Education Forum in summer 2021, the Council formally consulted on its draft Welsh in Education Strategic Plan (WESP) 2022-2032 between 15 October 2021 and 13 December 2021.
191. Links to the plan (including the full draft WESP, the easy read summary version and the Trajectory for Growth) and survey webpage were circulated to statutory stakeholders including Cardiff schools and Cardiff's Welsh Education Forum member organisations.
192. The draft WESP sets out the strategy for the development of Welsh-medium additional learning needs provision and proposals would be brought forward as part of the implementation of the Council's Welsh in Education Strategic Plan following agreement of the strategy by the Welsh Government and formal adoption by the Council later in 2022.
193. The ongoing development of additional learning needs provision including new and existing provision will be kept under review to ensure proposals are brought forward in a strategic and holistic way that takes into account

the needs of all of our learners and provides parity in the Welsh-medium sector as new places are delivered throughout the proposed WESP.

194. A full appraisal of the views expressed can be seen at Appendix 7.

### **Health provision**

195. The proposals to expand specialist provision at the above school sites will have implications for health and other specialist services, working in partnership with schools to meet Additional Learning Needs. An additional factor is the ALN Reform Act 2018, which will introduce new responsibilities for health, education and social care to work together to coordinate assessment and provision. The Act 2018 will be implemented over a three-year period, beginning in September 2021.
196. In order to address these challenges together, the Local Authority and Cardiff and the Vale University Health Board are undertaking a joint review of health and specialist provision in Cardiff special schools and pupil referral units. The findings of the review, overseen by a project group of representatives from health, education, social services, schools, and parents, will inform the design of the specialist provision.

### **Admissions Arrangements**

197. The Council would manage admissions to each of the special schools and Specialist Resource Bases in accordance with the ALN Code.

### **Learner Travel Arrangements**

198. There are no plans to change the Council's transport policy for school children.
199. Any pupils affected by the proposals would be offered the same support with transport as is provided throughout Cardiff in line with the same criteria that apply across Cardiff.
200. The Council's transport policy for school children can be viewed on the Council's website [www.cardiff.gov.uk/schooltransport](http://www.cardiff.gov.uk/schooltransport).
201. Any increase in demand for Learner Transport will require funding. Whilst the per pupil cost of school transport is likely to decrease further modelling is required to establish whether the overall transport costs are likely to increase or decrease.

### **Community Impact**

202. The following are taken into account when considering a proposal: Public Open Space, parkland, noise and traffic congestion. Officers will work with

schools, local members and any community group to make sure that the proposal avoids negative impacts if possible.

### **Local Member consultation**

203. Additional learning needs provision is city-wide, and members were consulted as part of the public consultation.

### **Scrutiny Consideration**

204. The Children and Young People's Scrutiny Committee will consider this report on 8 March 2022. Any comments received will be circulated at the Cabinet meeting.

### **Reasons for Recommendations**

205. To meet increasing demand for special school places for primary, secondary and post-16 age learners with Complex Learning Needs and Autism Spectrum Condition.

### **Financial Implications**

206. This report outlines the request to proceed to public consultation on changes to ALN provision and school's intake within the 11 schools identified. Publication of the recommended proposals does not, in itself commit the Authority to future expenditure so there are no capital financial implications directly arising from this report. However, once a final options paper is provided it will be necessary for a full financial evaluation to be undertaken. This evaluation will consider both capital and revenue implications for both the totality and each individual proposal. The aim of this will be to provide assurance that having considered all relevant costs each proposal remains both affordable and does not have an impact on the budgetary pressures facing the Council.
207. Additional places will need to be funded from the existing delegated school's budget. Previous pre consultation reports have highlighted the high-cost provision currently being incurred for this population of pupils either through Out of County Placements or enhanced Complex Needs Enhancement (CNE) payments for mainstream pupils. Further work is required to establish whether or not the savings on Out of County Placements or enhanced CNE payments will cover the additional costs of additional places and any associated transport costs.
208. Regarding revenue, there will need to be a review of the budget for each SRB or Special School which has an increase in the number of places. The due diligence undertaken must provide assurance that the additional places will be taken up and that the cost and numbers of Out of County Placements and CNE enhancements will reduce in order to ensure no significant pressure ongoing on school budgets. Over the medium term, regular review and analysis needs to be undertaken comparing the



projected number of places available to places taken up. This will ensure that the optimum benefits are achieved by the financial resources used.

209. The proposal for a better spread of provision at special schools and SRBs across the city means that the transport cost per individual learner is likely to decrease. However, as noted in both the body of the report and the Transportation implications there is need for further work in order to establish the full impact on transport costs both in the short term and the medium term. The decision maker needs to consider the likelihood that savings on individual placements and a more effective management of Out of County Placements will be able to cover the additional cost of transporting the increased SRB places. The covering report sets out that the number of places will incrementally grow over the next four years and further work is required to establish the cost / saving for each financial year. For 2022/23, there is a risk that overall spend on home to school transport, Out of County provision and enhanced CNE payments for children and young people with ALN would increase in September 22, but this pressure can be managed within school delegated budgets. However, the need to ensure robust modelling is in place to ensure that any further pressures are identified and understood prior to implementation and are robustly modelled and factored into medium-term planning is of paramount importance.

210. Regarding capital implications, any further work required to accommodate increased pupil numbers will require full financial evaluation and an identified funding source. Should the Council be required to make a contribution towards these costs, these will need to be funded from within existing approved resources or factored into future iterations of the Council's Capital Programme. As part of the further evaluation that is required, it will be necessary to consider VAT implications arising from land and property ownership arrangements in relation to Voluntary Aided and Foundation schools. Should there be any cost associated with the required VAT treatment, these will need to be included within the overall financial envelope of the scheme.

211. The Moorland Early Years Unit is to be funded from WG Flying start grant of £1.3m, with remainder to be funded from the Education Asset Renewal budget. In order to ensure sufficient budget, there will be a need to prioritise this scheme within the current asset renewal programme, with additional funding to be made available through the invest to save allocation of the schools capital budget.

### **Legal Implications**

212. Under the Education Act 1996, the Council has a general statutory obligation to promote high standards of education and to provide sufficient school places for pupils of compulsory school age, including appropriate provision for pupils with special educational needs (or additional learning needs).

213. A Local Authority can make school organisation proposals, including making 'regulated alterations' to a community school or a community

special school, under sections 42-44 of the Schools Standards and Organisation (Wales) Act 2013. The proposals set out in the report constitute 'regulated alterations' and must be considered having regard to the provisions of the 2013 Act and the School Organisation Code 2018, which sets out factors to be considered in respect of different proposals, the statutory procedures, legal requirements and guidance.

214. Where an increase in a school's capacity is proposed, the Council must have regard to evidence of current or future need/demand in the area for additional places, with reference to the school's language category (and religious character / gender intake if applicable). The Code also includes specific factors to be considered in relation to proposals for the reorganisation of provision for Special Educational Needs (or Additional Learning Needs). Cabinet will need to be satisfied that all relevant factors are properly considered in relation to the proposals.
215. The Council is required, prior to publishing its proposals, to undertake a consultation on its proposals in accordance with section 48 of that Act and the School Organisation Code 2018. Following the public consultation, the Council is required to publish and circulate to all interested parties (listed in the Code) a consultation report:
  - (i) summarising each of the issues raised by the consultees.
  - (ii) responding to these by means of clarification, amendment to the proposal or rejection of the concerns with supporting reasons;
  - (iii) setting out Estyn's response to the consultation in full; and
  - (iv) responding to Estyn's response by means of clarification, amendment to the proposal, or rejection of the concerns, with supporting reasons.
216. The consultation report may also make recommendations to the Cabinet about how to proceed, i.e., to publish the proposals as consultation on with any appropriate modifications, to abandon the proposals and retain the status quo or to significantly recast the proposals and re-consult.
217. This Cabinet report, together with the appendices constitutes the required consultation report; and seeks the Cabinet's approval to proceed to publish all proposals relating to Autism Spectrum Disorders and/or Complex Learning Needs referenced in the July and October 2021 Cabinet reports. Some modifications are recommended to the implementation dates of proposals at Moorlands Primary School and Willows High School.
218. In considering this matter, the Cabinet is required to review the proposals having regard to all further relevant information put forward during the consultation period (and otherwise). The recommendations relating to the Marion Centre and the Specialise Resource Base at Whitchurch High School are not within Cabinet's remit to determine but should be noted as part of the wider proposals.

## Land Matters

219. It is anticipated that if the proposals proceed, the Council will need to undertake due diligence on potential site constraints and subject to that, additional decisions may be required to deal with specific property, planning or procurement issues arising from this matter.

## Statutory Determination Process and Other Considerations

220. If the Cabinet decides to proceed, the proposals must be published within 26 weeks from the end of the consultation period (unless an extension of time is obtained from the Welsh Ministers). Proposals must be published by way of a statutory notice, allowing a minimum of 28 days for objections ('the Objection Period'). The content of the statutory notice, manner of publication and persons to be notified are prescribed in the Code.
221. Within 16 weeks from the end of the Objection Period, the Council must conscientiously consider any objections received and determine whether or not to implement its proposals (under section 53 of the 2013 Act). Members will note that the recommendation is for Cabinet to receive a further report at that stage.
222. If any objections are received during the Objection Period, the Council is required to publish an Objections Report summarising all objections made (and not withdrawn) and its response to those objections. The Objections Report must be published within 7 days from the date of the Council's determination of the proposals and made available to the interested parties listed in the Code. At the same time as publishing the Objections Report, the Council must also notify its decision to the Welsh Ministers, the school Governing Body and all interested parties listed in the Code.
223. If the proposals are taken forward, the admission arrangements, including admission numbers and catchment areas, will need to be determined, following consultation, in accordance with the School Admission Code and the Education (Determination of Admission Arrangements) (Wales) Regulations 2006.
224. In considering the proposals, the Council must have regard to its public sector equality duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The Protected characteristics are: age, gender reassignment, sex, race – including ethnic or national origin, colour or nationality, disability, pregnancy and maternity, marriage and civil partnership, sexual orientation, religion or belief – including lack of belief.
225. When taking strategic decisions, the Council also has a statutory duty to have due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage ('the Socio-Economic Duty' imposed under section 1 of the Equality Act 2010). In considering this, the Council

must take into account the statutory guidance issued by the Welsh Ministers and must be able to demonstrate how it has discharged its duty.

226. Due regard and consideration should be given to the outcomes of the Equalities Impact Assessment.
227. The Council must also be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards and consider the impact of its proposals upon the Welsh language.
228. The Well-being of Future Generations (Wales) Act 2015 requires the Council to consider how the proposals will contribute towards meeting its wellbeing objectives (set out in the Corporate Plan). Members must also be satisfied that the proposals comply with the sustainable development principle, which requires that the needs of the present are met without compromising the ability of future generations to meet their own needs.
229. The decision makers must be satisfied that the proposals fall within the Council's approved policy and budget framework.

### **HR Implications**

#### **HR implications relevant to the proposals for the establishment of Specialist Resource Base provision**

230. The implications below apply to the proposals to establish Specialist Resource Base provision at Moorland Primary School, Willows High School and Ysgol Gyfun Gymraeg Glantaf.
231. HR People Services will work with the Governing Body to address the HR implications arising from the establishment of a Specialist Resource Base at the school and the resulting need for additional staffing.
232. Where the Governing Body has adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the establishment of the Specialist Resource Base will provide opportunities for school-based staff on the school redeployment register.

#### **HR implications relevant to the proposals for the expansion of existing Specialist School Provision**

233. The implications below apply to the proposals to increase the capacity of Ty Gwyn Special School, Meadowbank Special School and The Hollies Special School.
234. The proposed increase in pupil numbers for the school will require the Governing Body to plan for the workforce requirements in readiness for the expansion. The Governing Body will be encouraged to undertake this work in line with the School Organisation Planning HR Framework. HR People Services will provide advice, support and guidance to the

Governing Body for the workforce planning and consequential recruitment processes.

235. Where the Governing Body has adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of an increase in the numbers on roll will provide opportunities for school-based staff on the school redeployment register.

#### HR implications relevant to the proposals for the expansion of existing Specialist Resource Base provision

236. The implications below apply to the proposals to increase the capacity of the Specialist Resource Bases at Llanishen High School, Llanishen Fach Primary School, Marlborough Primary School, Pentreban Primary School and Springwood Primary School.
237. HR People Services will work with the Governing Body to address the HR implications arising from the increase in the designated number of the Autism Spectrum Condition Specialist Resource Base at the school and the resulting need for additional staffing.
238. Where the Governing Body has adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the increase in the designated number of the Autism Spectrum Condition Specialist Resource Base will provide opportunities for school-based staff on the school redeployment.

#### Property Implications

239. Strategic Estates continue to work with and support Education colleagues through the asset management process and any property matters relating and arising from proposals. There are numerous options in this paper which will in time require input as and when the consultation period completes, and we move towards business cases.

#### Traffic and Transport Implications

240. The Council's Local Development Plan (2006-2026) includes a target of 50% of all journeys to be made by sustainable transport. Minimising the proportion of school journeys made by car and maximising opportunities for travel to school by active and sustainable modes can make an important contribution to achieving this target and reducing pressures on the transport network at peak times.
241. The individual needs of pupils at special schools and SRBs, together with greater distances travelled, necessarily limit the scope for high rates of active travel compared with mainstream schools.
242. The Council applies the statutory qualifying walking distance criteria for pupils to qualify for free home to school transport to special schools and SRBs. Additionally, some learners who live within two / three miles of the

school may be provided with free transport due to their individual learning needs and social issues.

243. The proposal for a better spread of provision at special schools and SRBs across the city means that the transport cost per individual learner is likely to decrease. However due to the increasing numbers of eligible learners there is still expected to be a risk of high transport costs. Further modelling is required to establish whether the demand on the school transport budget is likely to increase or decrease.
244. The existing high numbers of pupils eligible for Learner Transport are not generally expected to change significantly, however a proportion are able to, and may already, travel to school independently. These pupils as well as staff and school visitors would benefit from any required improvements in facilities for active travel to school or public transport facilities.
245. Each of the various school proposals to establish, expand or change designation of ALN facilities may require a Transport Assessment or Transport Statement which will identify measures to be included as part of the application to maximise travel by sustainable modes.
246. Responses to views expressed in the consultation have been set out above under the individual schools and SRBs to address specific concerns raised or to provide details of potential measures to be provided at specific sites.
247. The Council's current Corporate Plan includes a commitment to every school in Cardiff developing an Active Travel Plan. Such a plan will identify actions by the school to support and encourage active travel to school and also any improvements to on-site and off-site infrastructure required to facilitate active journeys.
248. Increasing travel to school by active modes will have a positive impact on children's health and wellbeing and will support the delivery of key actions and outcomes under Goal 5 the Council's Child Friendly City Strategy (2018), which relates to ensuring access to safe outdoor environments for formal and informal play, walking, cycling and scooting and active travel to school.
249. A number of initiatives have successfully demonstrated support and encouragement for active and sustainable travel amongst the ALN cohort, including Independent Travel Training for older pupils, cycle maintenance and cycle training.
250. Some pupils are able to travel independently or with parent/carers and if resident within the two-mile qualifying distance may not be eligible for Learner Transport.
251. Provision of recommended improvements for active travel would benefit these pupils as well as staff and visitors to the sites.

252. Numbers of pupils who continue to use Learner Transport for their journey to school will be likely to increase in line with the trend for increasing numbers of pupils requiring places at special schools or SRBs. Each school location with increased demand for Learner Transport vehicles will require suitable improved and / or expanded facilities for drop-off and pick-up within the site. The areas required would need to accommodate appropriate numbers of vehicles which may approximate to one taxi for a typical average of 3 pupils. In some cases, minibuses may be suitable, but this is also dependent on individual pupil needs, home locations and co-ordination of routes.
253. Car parking provision would be in line with the Council's parking standards. Allocations for special schools and SRBs are agreed on a case-by-case basis but requirements are expected to generally correlate with 1 car space per typical number of pupils in a class. This is in line with the standard 1 space per 30 pupils in mainstream schools, but results in a higher ratio of spaces due to the much smaller class sizes.

### **Impact of the proposals on the Welsh Language**

254. The Council is committed to developing a Bilingual Cardiff.
255. Cardiff's Welsh in Education Strategic Plan (WESP) 2022-2031 sets out a series of ambitious commitments to build on the progress achieved to date. These will ensure that every child in the city can receive an education in the language of Welsh, the number receiving their education in Welsh-medium schools will increase, and through the significant use of Welsh in English medium education all will have the opportunity to become confident in speaking Welsh.
256. The level of special educational needs/ additional learning needs in the Welsh-medium sector has historically been lower than in the English medium sector. This has however been changing over the last 4-5 years, with schools reporting an increased incidence of additional learning needs, in all areas of need.
257. A review of additional learning needs in the Welsh-medium sector was undertaken with Welsh medium schools in 2016 to inform the Welsh in Education Strategic Plan (WESP). Schools reported a small but significant number of examples of pupils with additional learning needs leaving the Welsh-medium sector in order to access Specialist Resource Bases or special schools.
258. There was also some anecdotal evidence to suggest that some families who would otherwise choose Welsh-medium education opt instead for English medium if their child has additional learning needs, through concern that their child may need to transfer to the specialist sector at a later date.
259. Through the WESP, Cardiff has invested in specialist provision in the sector, including some capacity to respond to growing demand and to

generate more confidence in the availability of specialist provision in the sector.

260. A new primary base was established at Ysgol Gymraeg Pwll Coch, within the catchment area of Ysgol Gyfun Gymraeg Glantaf, where the secondary base is established. The two bases cater for learners with severe learning difficulties, providing a specialist curriculum and supporting a range of secondary needs including physical and medical needs, speech and language difficulties and autism.
261. As the Welsh sector continues to grow it will be important to develop additional provision in anticipation of the need, to ensure Welsh-medium education is a genuine choice for learners with complex additional learning needs.
262. Following engagement sessions with members of Cardiff's Welsh Education Forum in summer 2021, the Council formally consulted on its draft Welsh in Education Strategic Plan (WESP) 2022-2032 between 15 October 2021 and 13 December 2021.
263. Links to the plan (including the full draft WESP, the easy read summary version and the Trajectory for Growth) and survey webpage were circulated to statutory stakeholders including Cardiff schools and Cardiff's Welsh Education Forum member organisations.
264. The draft WESP sets out the strategy for the development of Welsh-medium additional learning needs provision and proposals would be brought forward as part of the implementation of the Council's Welsh in Education Strategic Plan following agreement of the strategy by the Welsh Government and formal adoption by the Council later in 2022.
265. The Cabinet approved Cardiff's WESP 2022-2031 at its meeting of 24 February 2022, for submission to the Welsh Government Ministers.
266. The ongoing development of additional learning needs provision including new and existing provision will be kept under review to ensure proposals are brought forward in a strategic and holistic way that takes into account the needs of all of our learners and reflects the additionality required to ensure parity in the Welsh-medium sector as new places are delivered throughout the proposed WESP.

### **Wellbeing of Future Generations**

267. In line with the Well-being of Future Generations Act Cardiff's School Organisation Programme is committed to providing Local Schools for Local Children, together with encouraging use of sustainable modes to travel to schools, such as walking and cycling. Each school project takes into account key transport issues when they are being designed and the firm need to provide safer routes to encourage walking, cycling and other active travel modes to schools.



268. With the current investments in ICT across the city, student movements may be further reduced as mobile technology develops further allowing for flexible teaching methods. These have the potential to result in a more efficient Travel Plan and further contribute to the Council's targets to reduce its carbon emissions.
269. In order to maximise the long-term impact of this significant investment, any design taken forward for each school included in this proposal would be developed to ensure the delivery of high-quality modern facilities that are able to respond to the current pupil populations needs and support the delivery of effective teaching and learning methods. They would also incorporate the flexibility to take account of changes depending on need as time progresses; such as changing demographics and pupil numbers, changing curriculum and changing types of pupil needs.

### **Equality Impact Assessment**

270. An Equality Impact Assessment has been carried out. It concluded that the proposed changes would not negatively affect a particular group in society.
271. The Equality Impact Assessment is attached at Appendix 9.

### **RECOMMENDATIONS**

The Cabinet is recommended to

1. authorise officers to proceed to publish proposals in accordance with section 48 of The School Standards and Organisation (Wales) Act 2013 to:
  - establish a 20 place Specialist Resource Base for primary aged children with Complex Learning Needs at Moorland Primary School from September 2023
  - establish a 30 place Specialist Resource Base for learners with complex learning needs at Willows High School from September 2023
  - increase the designated number at the Llanishen High School Specialist Resource Base for learners with Autism Spectrum Condition from 20 to 45 places from September 2022
  - establish a 30 place Specialist Resource Base at Ysgol Gyfun Gymraeg Glantaf alongside the existing 30 place Specialist Resource Base for learners with Autism Spectrum Condition from September 2023
  - increase the designated number of Ty Gwyn Special School from 198 to 240 from September 2022

- increase the designated number of Meadowbank Special School from 40 to 98 from September 2022
  - increase the designated number of The Hollies Special School from 90 to 119 from September 2022; further increase the designated number of The Hollies Special School from 119 to 150 from September 2023
  - increase the designated number at the Specialist Resource Base at Llanishen Fach Primary School for learners with complex learning needs from 20 to 30 places from September 2023
  - increase the designated number at the Specialist Resource Base at Marlborough Primary School for learners with severe and complex learning needs from 20 to 30 from September 2022
  - increase the designated number at the Specialist Resource Base at Pentreban Primary School for learners with Autism Spectrum Condition from 20 to 24 spaces from September 2022
  - increase the designated number at the Specialist Resource Base at Springwood Primary School for learners with Autism Spectrum Condition from 20 to 28 from September 2022
2. Note that prior to implementation of the proposals a further report will be provided to Cabinet providing details of any objections received, the proposed responses to those objections and recommendations for implementation or otherwise of the proposals.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Melanie Godfrey</b> Director of Education & Lifelong Learning
	4 March 2022

*The following appendices are attached:*

- Appendix 1 – Consultation Documents
- Appendix 2 – Summary Documents
- Appendix 3 – Notes of meetings with Governing Bodies and School Staff
- Appendix 4 – Notes of pupil engagement meetings
- Appendix 5 – Notes of public meetings
- Appendix 6 – Formal responses received
- Appendix 7 – Summary of responses received and appraisal of views
- Appendix 8 – Summary analysis of consultation responses
- Appendix 9 – Equality Impact Assessment

**SCHOOL ORGANISATION PROPOSALS: PROVISION FOR CHILDREN AND YOUNG PEOPLE WITH ADDITIONAL LEARNING NEEDS (ALN)**

**EDUCATION, EMPLOYMENT & SKILLS (COUNCILLOR SARAH MERRY)**

**AGENDA ITEM: 4**

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**Reason for this Report**

1. To enable the Cabinet to consider recommendations to hold public consultation on a range of proposals, consistent with the Cardiff 2030 vision for education and learning, to strategically extend and realign special school and Specialist Resource Bases which would provide:
  - 136 additional Secondary and post-16 Emotional health and wellbeing needs (EWHN) places
  - 139 additional Secondary age Complex Learning and Autism Spectrum Condition places
  - 42 additional Age 3-19 Complex Learning and Autism Spectrum Condition places
  - 150 additional Primary Complex Learning and Autism Spectrum Condition places

**Background**

2. At its meeting on the 12 of October 2017, the Cabinet received a report 'Developing the School Estate' which outlined the challenges and opportunities facing Cardiff in the development of the education estate.
3. The report outlined the sufficiency, suitability and condition issues in Cardiff which provide the basis of the funding request from Cardiff to Welsh Government under the 21st Century Schools Band B Programme. A copy of the 14 December 2017 Cabinet Report is included at Appendix 1.
4. The Band B Programme seeks to address the most acute sufficiency and condition issues in Cardiff. Four special schools are identified for redevelopment: Riverbank Special School and Woodlands High School, for pupils with complex learning needs/ autism, and The Court School and Greenhill School, for pupils with emotional health and wellbeing needs.

5. Proposals in relation to Riverbank and Woodlands were agreed by the Welsh Minister on 21 July 2020.
6. At its meeting on 15 July 2021 the Cabinet authorised officers to consult on proposals for The Court Special School and the establishment of Specialist Resource Base provision at Moorland Primary School for learners with complex learning needs. A copy of the 15 July 2021 Cabinet Report is included at Appendix 2.
7. This report brings forward the proposals to expand Emotional Health & Wellbeing provision for secondary age and post 16 learners, identified in the Council's 21<sup>st</sup> Century Schools Band B programme, to address the shortfall of places and to provide the best opportunities for learners.
8. While the 21st Century Schools Band B Programme will provide opportunities to address special school sufficiency issues, there will also be a need to take steps to extend provision to meet demand for places beyond this.

### **Achieving Cardiff's Learning Entitlement Goal**

9. Cardiff's 2030 vision for education and learning in Cardiff sets a goal of A Learning Entitlement, in which all children and young people are able to access appropriate routes into education and learning opportunities that enable them to achieve, thrive and realise their individual dreams and ambitions. In order to improve outcomes for Cardiff's most vulnerable learners, many of whom face barriers to engagement in education and learning, addressing inequality is key.
10. An effective, inclusive approach to supporting ALN in Cardiff includes the following principles:
  - Schools and settings that deliver an innovative curriculum with effective whole school approaches to teaching and learning; emotional health and wellbeing.
  - Excellent specialist services to enhance the capacity of schools and other settings to include children and young people with a range of ALN
  - Effective early identification and research-based intervention to prevent the escalation of ALN wherever possible
  - High levels of accessibility in every school building with sufficient flexible accommodation in every school appropriate to the age and stage of learning
  - Strong partnerships to ensure a holistic, collaborative response to a child or young person's ALN (including health, children and adult services, early years and FE providers)

- Effective multi-agency transition planning at every stage, from early years through to primary, secondary, post 16 and adult destinations, to support admission without delay
11. The number of children requiring specialist placement as a result of their learning disabilities has been increasing in Cardiff over the last 5 years, and steps were taken in 2018 to increase the number of specialist places available.
  12. The proposals identified within this report seek to improve access to education from early years, through to Post 16 education, consistent with the above principles of inclusion. The expansion of specialist provision brings forward effective pathways for specific groups of learners who face greater challenges, including Children Looked After, young people educated other than at school (EOTAS) and pupils eligible for free school meals who are disproportionately represented in specialist provision.
  13. The proposed expansion of special school and specialist resource base provision provides a strategic solution that focuses on sustainable growth of established and successful specialist provision and reduces the Council's reliance on out of county and independent placements in coming years.
  14. The development of purpose-built accommodation, and the adaptation of existing buildings to extend successful provision, greatly improves accessibility to meet the needs of learners.
  15. The overall increase in provision, to more closely match the projected need for places, would enable a greater number of learners to be placed in provision that is within or closer to their local community, to reduce travel times for those learners, and in turn reduce the average cost per learner of travel to school.

## **Issues**

### **Sufficiency in the Special Sector**

16. Cardiff Council is committed to the principles of inclusion and recognises that the majority of children and young people with additional needs are best supported in their local mainstream schools. The Council will continue to provide support, training and resources to schools, promote the sharing of best inclusive practice and ensure that learners with ALN access effective support in their local school.
17. However, it is recognised that in order to thrive and fulfil their potential, children and young people with the most complex Additional Learning Needs require access to the specialist environments and expertise of a special school or Specialist Resource Base.
18. At present, both primary and secondary schools in Cardiff host specialist resource base provision. Some are designated to support children with complex learning needs who require a specialist curriculum taught in a

small class environment and some are designated for learners with autism or hearing impairments who require specialist support to access mainstream learning, with access to a nurturing base for some learning and unstructured time.

19. The purpose of a Specialist Resource Base (SRB) is to enable learners with learning difficulties to succeed in a mainstream school environment. Pupils are taught in a small class by specialist staff and benefit from a specialist curriculum, while benefiting from the full range of education opportunities available to all pupils at the school.
20. In 2020-21, a total of 1,116 places were funded in specialist resource bases or special schools, while the wellbeing and speech and language classes had capacity for up to 48 primary learners on temporary placements and 90 places in the Pupil Referral Unit.
21. Whilst there are a number of existing specialist settings across Cardiff, there are currently insufficient places available. This insufficiency of places compared to need is projected to increase over coming years.
22. Owing to insufficient places in Cardiff maintained special schools, the Council has also funded some places at special schools maintained by other LAs, or in independent schools. In addition, the Council is responsible for funding additional support or specialist placement provided by other local authorities for children looked after who are placed out of area. The total spend on all 'out of county' provision, was £6.3m in 2020-21. The budget for 2021-22 is currently set at £7.3m.
23. Spending on independent places and special school places in neighbouring local authorities has grown to c£3.8m in 2020/21, of which c£2.5m has funded places in specialist provision for those learners with Emotional Health & Wellbeing Needs. Some of these may have been able to be placed at Greenhill Special School if a greater number of places were available. Without investment in additional places, this figure would be expected to grow significantly in future years.
24. The majority of learners with Additional Learning Needs attend a local mainstream school, and benefit from effective Additional Learning Provision, without the need for special school or Specialist Resource Base places. However, the number of pupils with severe and complex needs, requiring a place in a special school or specialist resource base has continued to grow due to:
  - Pupil population growth, especially at primary phase, with the larger primary cohorts now moving through to secondary phase
  - Improved survival rates for children born with significant disabilities, resulting in a higher incidence of severe and complex disabilities. Cardiff schools are highly inclusive, and the extent to which pupils' additional learning needs can be met in their local schools has increased steadily; however, the increased complexity of the population has meant that the need for specialist provision has

continued to grow, and the range of expertise, specialist support and facilities required in special schools and SRBs has also increased.

- Increased incidence and identification of specific needs such as autism, Attention Deficit & Hyperactivity Disorder (ADHD), physical disabilities and sensory impairments
- Higher incidence of children and young people with emotional health and wellbeing needs, a trend which pre-dates COVID 19, but has been exacerbated by school closures and other measures to manage the pandemic

25. At the end of March 2021 there were 2,265 learners in Cardiff whose Additional Learning Needs were identified in a statement, which sets out their needs and the support they require. As the population grows, so will the number of children and young people with significant and complex Additional Learning Needs.

### Demand for places

26. The development of specialist provision in Cardiff has not kept pace with the growth in needs and demand for places. This has resulted in a deficit of approximately 370 places in 2020-21. The deficit is predicted to grow to approximately 485 by 2025-26 if no further provision is developed. Information regarding projections and forecasts and the methodologies used to establish likely demand are set out in Appendix 3.

27. The below table provides a summary of the current and projected deficit of specialist places.

Table: City-wide special school and SRB capacity 2021/ 2022 and projected deficit of places (including 10% allowance for growth)			
	Capacity 2021-22	Projected deficit 2021-22	Projected deficit 2025-26
Primary complex learning and Autism Spectrum Condition	472	89	108
Primary Emotional Health and Wellbeing Needs	90	28	38
Secondary complex learning and Autism Spectrum Condition	556	82	123
Secondary Emotional Health and Wellbeing Needs	172	182	211
Post 16 Emotional Health and Wellbeing Needs	8	19	28
<b>Total</b>	<b>1,298</b>	<b>400</b>	<b>508</b>

28. The 21<sup>st</sup> Century Schools Band B Programme sets out proposals to provide additional places at four schools, Proposals for Riverbank

Special School and Woodlands High School were approved by Welsh Government in September 2019 and will provide 42 and 100 additional places respectively. The Council is consulting in autumn 2021 on proposals to provide 30 additional places at The Court School and to establish a new Specialist Resource Base of 20 places at Moorland Primary School. These proposals will reduce the projected deficit by 190 places but will not deliver additional places for some time.

29. The shortfall in Cardiff maintained specialist provision has led to significant growth in pupils in education other than at school (EOTAS), continued over-reliance on places in the independent sector and pupils supported in mainstream schools while awaiting placement.
30. The majority of Cardiff parents of children who require specialist placement express a preference for places in Cardiff special schools or Specialist Resource Bases for their child.
31. Whilst the Council works closely with the independent sector and with other Local Authorities to ensure there are sufficient appropriate placements to support the Council in fulfilling its statutory responsibilities, there is a further risk that there would be insufficient places in future, especially for primary aged pupils. Over-reliance on the sector could therefore result in the Council being unable to fulfil statutory responsibilities.
32. The shortfall in Cardiff's specialist provision has resulted in:
  - Significant continued reliance on places in the independent sector and in neighbouring Local Authorities
  - Some learners remaining in mainstream schools with high levels of support, contributing to the significant growth in the cost of mainstream statements
  - A number of learners with highly complex needs who would be better placed in special schools, attending SRBs. While the bases have the expertise to meet the needs of these learners, the pupils themselves receive little benefit from placement in a mainstream environment and this over-reliance on SRBs reduces the places available for learners who need and can benefit from an SRB.
  - Increased risk of appeals to Tribunal

### **Secondary and Post 16 Emotional Health and Wellbeing Needs provision**

33. In 2021/22 there are a total of 172 secondary age (age 11-16) specialist emotional health and wellbeing needs places in Cardiff maintained schools (Including EOTAS commissioned places).
34. Taking account of all children requiring such a placement, including those placed out of county, and in mainstream awaiting specialist placement, the total demand for places is estimated to be circa 322 in 2021/ 2022, projected to rise to 348 by 2025/ 2026.



35. Allowing for a 10% surplus to support flexibility, capacity is required for 354 pupils in 2021/22, and 383 places by 2025/ 2026. In summary, there is an estimated deficit of 182 secondary places in 2021/ 2022, rising to 211 by 2025/ 2026.
36. Until 2018, Cardiff did not maintain any post-16 places for emotional health and wellbeing needs, however pupils funded in the independent sector often remain to age 19 (Year 14). Eight Post-16 places were established at Greenhill following formal consultation in 2018. The number of learners enrolled has already risen to 15 in 2021/ 2022. There is an estimated deficit of 19 places in 2021/ 2022, rising to 28 by 2025/ 2026.
37. It is difficult to accurately predict demand for places in this age group, but it is known that the majority of special school pupils are not able to sustain a successful transition to an FEI or to employment at age 16.
38. Secondary special school provision should include post-16 provision with capacity for the majority of Key Stage 4 pupils to stay on until they are age 18 or 19 i.e. a special school for 56 Key Stage 3 and 4 learners should include 24 post-16 places.

### **Secondary and post 16 Complex Learning and Autism Spectrum Condition provision**

39. In 2020/21 there is a total of 461 secondary age and post-16 specialist Complex Learning and Autism Spectrum Condition places in Cardiff maintained schools.
40. Taking account of all children requiring such a placement, including those placed out of county, and in mainstream awaiting specialist placement, the total demand for places is estimated to be circa 580 in 2021/ 2022, projected to rise to 629 by 2025/ 2026.
41. Allowing for a 10% surplus to support flexibility, capacity is required for 638 pupils in 20/21, and 692 places by 2025/ 2026. In summary, there is an estimated deficit of 177 places in 2021/ 2022, reducing to 131 places by 2025/ 2026.

### **Primary Complex Learning/ and Autism Spectrum Condition provision (age 4-11)**

42. In 2021/ 2022 Cardiff maintains 413 primary special school and Specialist Resource Base places for children with complex learning needs or autism. Projects previously agreed by Cabinet, to extend and rebuild Riverbank Special School and to establish a Specialist Resource Base at Ysgol Gymraeg Pwll Coch, will increase the total to 465 places by 2025.
43. Taking account of all children requiring such a placement, including those placed out of county, and in mainstream awaiting specialist

placement, the true demand for places is estimated to be circa 510 in 2020/ 2021, rising to 547 by 2025/ 2026.

44. Allowing for a 10% surplus to support flexibility, capacity is required for 550 pupils in 2020/ 2021, and 602 pupils by 2025/ 2026.
45. In summary, there is an estimated deficit of 148 in 2021/ 2022. If there were no further growth beyond current plans in relation to Riverbank Special School and Ysgol Gymraeg Pwll Coch, a deficit of circa 137 places will remain in 2025/ 2026.
46. The Cabinet, at its meeting in July 2021, authorised officers to consult on proposals to establish a Specialist Resource Base at Moorland Primary School. This additional provision would reduce the projected deficit by 20 places, and would improve the geographical distribution of provision in the south of the city.
47. Additional information, regarding projections and forecasts and the methodologies used to establish likely demand are set out in Appendix 2.

### **Proposed Schemes**

48. The Council has taken, and will continue to take, a range of steps to increase provision within existing accommodation and designated numbers wherever possible. Such actions do not require formal consultation unless they require a 'regulated alteration'.
49. The proposed schemes set out below require 'regulated alterations'. Under the Schools Standards and Organisation (Wales) Act 2013, a Local Authority can make proposals to make regulated alterations and is required prior to publishing its proposals to undertake a consultation on those proposals in accordance with section 48 of that Act and the School Organisation Code.
50. Any proposals must be the subject of full and fair consultation and due regard must be had by the Cabinet to the responses before a final decision is taken.
51. Admissions to Special School and Specialist Resources Bases are managed by the Council. Admission is subject to a statement of Special Educational Need and is managed by the Council, in line with the SEN Code of Practice for Wales, which will be replaced by the ALN Code from September. All types of provision offer places to pupils from across the city.
52. The Council has identified a number of proposals that would increase the number of ALN places at existing provision as follows:
  - increase the capacity of Greenhill Special School from 64 to 160 places. The school would transfer to new build accommodation across two sites at the Ty Glas in Llanishen and the Dutch Garden Centre site with 80 places on each site from September 2025

- establish a 20-place Specialist Resource Base for emotional health and wellbeing at Cardiff West Community High School from September 2022
- establish a 20-place Specialist Resource Base for emotional health and wellbeing at Eastern High from September 2022
- increase the designated number of the Llanishen High School Autism Specialist Resource Base from 20 to 45 places from September 2022
- increase the designated number at The Marion Centre Specialist Resource Base from 42 to 66 places from September 2022
- increase the designated number of the Whitchurch High School Specialist Resource Base from 70 to 100 places from September 2022
- establish a 30 place Specialist Resource Base for complex learning needs at Willows High School from September 2023
- establish a 30 place Autism Special Resource Base alongside the existing 30 place Specialist Resource Base at Ysgol Gyfun Gymraeg Glantaf from September 2023
- increase the designated number of Ty Gwyn Special School from 198 to 240 from September 2022
- increase the designated place number of the Specialist Resource Base at Llanishen Fach Primary School from 20 to 30 places from September 2023
- increase the designated number at Marlborough Primary School Specialist Resource Base from 20 to 30 from September 2022
- increase the designated place number of Meadowbank Special School from 40 to 98 from September 2022
- increase the designated number at the Pentrebane Primary School Autism Specialist Resource Base from 20 to 24 spaces from September 2022
- increase the designated number at Springwood Primary School Autism Specialist Resource Base from 20 to 28 from September 2022
- increase the designated number of The Hollies Special School from 90 to 119 from September 2022
- further increase the designated number of The Hollies Special School from 119 to 150 from September 2023

53. These proposals would provide:

- 136 additional Secondary and post-16 Emotional health and wellbeing needs (EWHN) places
- 139 additional Secondary age Complex Learning and Autism Spectrum Condition places
- 42 additional Age 3-19 Complex Learning and Autism Spectrum Condition places
- 150 additional Primary Complex Learning and Autism Spectrum Condition places

54. Details of the proposed changes are set out at paragraphs 53 – 135.

## **Secondary age and Post 16 Emotional Health and Wellbeing proposals**

### **Greenhill Special School**

55. Greenhill Special School is a 64 place special school for city-wide learners aged 11 – 19. All of the children have significant Emotional Health and Wellbeing Needs (the PLASC designation is Behaviour Emotional and Social Difficulties – BESD).
56. The Council consulted on proposals to extend the age range of the school from 11-16 to 11-19, and to increase the capacity of the school from 56 places to 64 places, in spring 2018 and the proposals were determined by the Welsh Government in November 2018.
57. All pupils enrolled at Greenhill Special School have a statement of special educational needs. The statutory assessment process for these young people has identified that their additional learning needs cannot be met in a less specialised environment.
58. The purpose of Greenhill Special School is to provide a specialist learning environment and curriculum, where learners can fulfil their potential.
59. To meet the increasing demand for secondary special school places for learners with emotional health and wellbeing needs it is proposed to:
  - increase the capacity of Greenhill Special School from 64 to 160 places. The school would transfer to new build accommodation across two sites at the Dutch Garden Centre site, Maes Y Bryn Road (near to M4 J30) and Ty Glas Road in Llanishen, with 80 pupils on each site from September 2025.
60. An expansion of Greenhill over two sites, each of 80 places, would support the school to further develop its curriculum and would enable it to transform learning opportunities for a greater number of Cardiff's most vulnerable learners in a purpose built, 21<sup>st</sup> Century specialist learning environment.

### **Land matters relating to Greenhill Special School**

#### **Existing site**

61. The Council has appraised a number of sites city-wide that would most suitably accommodate replacement of and expansion of the current Greenhill School. Given the land requirement to deliver schools compliant with Building Bulletin 102, the search has been expanded to land not currently in within the ownership of the Council.
62. In the context of the specific needs of the learners accessing such provision, both class sizes and overall site capacities are subject to reduced limits compared to mainstream schools. The expansion of Greenhill to accommodate up to 160 learners aged 11-19, as 80 places

each on two sites, therefore provides the most appropriate organisation of places.

63. The existing school site measures approximately 2.7Ha and accommodates up to 64 learners. Whilst this site is sufficiently large to accommodate part of the future proposed capacity of Greenhill, site constraints make this site difficult to develop as a replacement fit-for purpose 21st Century school whilst pupils remain on site.
64. Construction of a new school on-site, or redevelopment of the existing school, would impact teaching and learning and would be excessively disruptive to the vulnerable learners on a very confined area of the site. The proximity of the works to the existing school building would cause significant disruption, and this would be exacerbated for those students with sensory issues. Much of the Greenhill curriculum is delivered outdoors, so the overall ability to operate effectively to meet the needs of these learners would be greatly compromised for an extended period of time.
65. The redevelopment of the Greenhill site for a replacement school has therefore been discounted.
66. It is anticipated that the existing site of Greenhill School would be disposed of for capital receipt at the end of the build programme.

#### **Dutch Garden Centre site**

67. In February 2018, the Council's cabinet agreed the acquisition of land adjacent to Junction 30 of the M4, occupied by the Dutch Garden Centre, in order to secure an important strategic site. The Cabinet Report of 15 February 2018 is attached as Appendix 4. The total site area measures c2.84Ha.
68. The site is located outside of the existing settlement boundary but has an established mixture of buildings to include a functional garden centre, storage facilities and small businesses.
69. The Cabinet Report outlined that subject to planning permission, the site had a number of potential uses to satisfy Council requirements to include Additional Learning Needs / Special Education Needs school facilities. Due to its location on the edge of the city boundary, the site would benefit from the wide catchment area served by such schools including the provision of out-of-county placements. It was also noted that the designation of the area as Green Wedge, rather than Green Belt, was significant in that it would allow the status of the area to be reviewed every time the Local Development Plan is reviewed. Notwithstanding the above, any proposal would need to be considered against up to date policy and have regard to all relevant planning considerations.
70. The site is presently occupied by commercial tenants on short-term agreements, which would enable the Council to bring forward proposals without significant delay.

71. In order that this site may be considered for redevelopment, further feasibility work and the relevant assessments for its location have been undertaken. Findings from these reports suggests that a new-build school on this site would need to be designed with sympathetic build materials and landscaping consistent with its location. The design and landscaping would also need to demonstrate planning acceptability in terms of impact on the landscape character and quality. In order to establish the principle of development at this location a full justification regarding the site's location within the green wedge will need to be provided along with details to address all relevant planning considerations.

### **Ty Glas site, Llanishen**

72. The Council was presented with an opportunity to secure a strategic site in north Cardiff on Ty Glas Road extending to c7.2Ha which is in third party ownership. The acquisition of this site was subject to a separate Cabinet report in September 2021, a copy of which is attached as Appendix 5.
73. The site lies within the settlement boundary and subject to addressing all material considerations, it is considered that the principle of developing the site for educational use can be justified. The site does have a number of constraints but with appropriate investigation and mitigation it is considered that this site would be an excellent location for both mainstream secondary school provision and Additional Learning Needs education provision.
74. As part of feasibility studies undertaken, The Council's Traffic & Transport Department encourages and supports new access proposals for both the ALN and secondary provision, noting the site provides an opportunity to redesign accesses in more appropriate locations, and linking this site to the wider community with sustainable transport and active travel measures.
75. Site size & phasing will be reviewed against any constraints, but there is an opportunity to accommodate an 80 place school for pupils with social, emotional and behavioural issues, and mainstream secondary school provision. The ALN school falls within Band B of the Council's and Welsh Government's 21st Century Schools programme, and any future development on the site is likely to fall under the Band C programme.

### **Cardiff West Community High School Emotional Health and Wellbeing Base**

76. Cardiff West Community High School is an English-medium community high school for pupils aged 11-18. The school is located at Penally Road, Caerau.
77. To meet the increasing demand for secondary specialist resource places for learners with emotional health and wellbeing needs it is proposed to:

- establish a 20 place Specialist Resource Base for emotional health and wellbeing needs at Cardiff West Community High School from September 2022.

78. It is proposed that the newly established base would be accommodated within the existing school buildings.

### **Eastern High Emotional Health and Wellbeing Base**

79. Eastern High is an English-medium community high school for pupils aged 11-16. The school is co-located with Cardiff & Vale College post-16 provision at Trowbridge Road, Trowbridge.

80. To meet the increasing demand for secondary specialist resource places for learners with emotional health and wellbeing needs it is proposed to:

- establish a 20 place Specialist Resource Base for emotional health and wellbeing needs at Cardiff West Community High School from September 2022.

81. It is proposed that the newly established base would initially be accommodated within the existing buildings shared by Eastern High and Cardiff and Vale College, with later works to be undertaken to provide additional accommodation and facilities.

### **Secondary Complex Learning Needs and Autism Spectrum Condition proposals**

#### **Llanishen High School**

82. Llanishen High School is an English-medium community high school for pupils aged 11-19. The school hosts an Autism Spectrum Condition base and base for hearing impaired learners. The school is located at Heol Hir in Llanishen.

83. The designated number for the Autism Spectrum Condition base is 20, however, there are currently 45 learners on roll who access the base.

84. To meet increasing demand for secondary specialist resources places for learners with Autism Spectrum Condition it is proposed to:

- increase the designated number of the Llanishen High School Autism Spectrum Condition Specialist Resource Base from 20 to 45 places from September 2022

85. Interim works have been undertaken and further works would be necessary to improve and extend the current Specialist Resource Base facilities and accommodation.

86. No changes are proposed in relation to the school's Specialist Resource Base for learners with a hearing impairment.

## **Marion Centre, The Bishop of Llandaff Church in Wales High School**

87. The Bishop of Llandaff is an English-medium Church in Wales High School for pupils aged 11-18. The school hosts a Specialist Resource Base, named the Marion Centre, designated for pupils with autism. The School is located at Rookwood Close in Llandaff.
88. The designated number for the centre is 42 however there are currently 66 learners on roll.
89. To meet the demand for secondary specialist resource places for learners with complex learning needs it is proposed to:
  - increase the designated number at The Marion Centre Specialist Resource Base from 42 to 66 places from September 2022.
90. It is proposed that the current Specialist Resource Base accommodation would be improved and refurbished, creating additional classrooms and learning spaces.
91. As set out in the School Organisation Code (011/2018), the governing bodies of voluntary schools may make proposals to make a regulated alternation to their school. The proposed increase in the designated number would constitute a regulated alteration. The Governing Body of the school would therefore be required to undertake a public consultation prior to the publication of any proposal.
92. The Governing Body of the school has agreed that the consultation process required for the proposed regulated alterations be supported by the Council. Following consultation, the Governing Body would be required to issue a consultation report, responding to issues raising during the consultation, and may then proceed to publish its statutory proposals.

## **Whitchurch High School**

93. Whitchurch High School is an English-medium Foundation school for pupils aged 11-18. The school hosts a Specialist Resource Base designated for complex learning needs. The school is located over two sites at Manor Way and Penlline Road in Whitchurch.
94. The designated number for the base is 70 however there are currently 96 learners on roll.
95. To meet the demand for secondary Specialist Resource Base places for learners with complex learning needs it is proposed to:
  - increase the designated number at Whitchurch High School Specialist Resource Base from 70 to 100 places from September 2022.



96. Works have been undertaken by the school to extend and improve the current Specialist Resource Base accommodation to facilitate the additional pupils.
97. As set out in the School Organisation Code (011/2018), the governing bodies of Foundation schools may make proposals to make a regulated alternation to their school. The proposed increase in the designated number would constitute a regulated alteration. The Governing Body of the school would therefore be required to undertake a public consultation prior to the publication of any proposal.
98. The Governing Body of the school has agreed that the consultation process required for the proposed regulated alterations be supported by the Council. Following consultation, the Governing Body would be required to issue a consultation report, responding to issues raising during the consultation, and may then proceed to publish its statutory proposals.

### **Willows High School**

99. Willows High School is an English-medium community high school for pupils aged 11 – 16. The school is currently located at Willows Avenue, Tremorfa.
100. At its meeting on 23 September 2021 the Cabinet agreed to proceed with the Band B 21<sup>st</sup> Century Schools Programme proposals to transfer the school to new build accommodation at Lewis Road, Splott. It is anticipated that the new buildings would be completed in September 2025.
101. To meet increasing demand for secondary Specialist Resource Base places for learners with complex learning needs it is proposed to:
  - establish a 30 place Specialist Resource Base at Willows High School from September 2023
102. Consistent with the proposals to establish a Specialist Resource Base for primary age learners at Moorland Primary School within the catchment area of Willows High School, as set out in paragraph 30, this additional provision would improve the geographical distribution of provision in the south of the city.
103. It is proposed that works would be undertaken to adapt existing accommodation within the school to accommodate the Specialist Resource Base from September 2023, and purpose-built accommodation would also be developed as part of the new Willows High School.

### **Ysgol Gyfun Gymraeg Glantaf**

104. Ysgol Gyfun Gymraeg Glantaf is a Welsh-medium community high school located at Bridge Road in Llandaff North for pupils aged 11-18.

The school hosts a Specialist Resource Base designated for complex learning disabilities.

105. To meet the increasing demand for secondary Specialist Resource Base places for complex learning disabilities and autism spectrum conditions in the Welsh medium sector it is proposed to:

- establish a 30 place Autism Spectrum Condition Specialist Resource Base, alongside the existing 30 place Learning Resource Base, from September 2023

106. It is proposed that new accommodation would be developed on site to provide purpose-built facilities for both resource bases.

### **3-19 Complex Learning Needs and Autism Spectrum Condition places**

#### **Ty Gwyn Special School**

107. Ty Gwyn is a special school located at Vincent Road in Caerau and is designated to provide 198 places for learners aged 3-19 with complex learning disabilities and autism spectrum conditions. The school has been federated with Riverbank Special School and Woodlands High School, as the Western Learning Campus Federation, since January 2018.

108. The Council consulted on proposals to increase the capacity of the school from 150 places to 198 places in spring 2018 and the proposals were determined in July 2018.

109. To meet the increasing demand for primary and secondary special school places for learners with complex learning disabilities or Autism Spectrum Condition it is proposed to:

- increase the designated number of Ty Gwyn Special School from 198 to 240 places from September 2022.

110. It is proposed that the school would expand by adapting the former Trelai Youth Centre to provide additional accommodation and facilities.

#### **Primary Complex Learning Needs and Autism Spectrum Condition proposals**

##### **Llanishen Fach Primary School**

111. Llanishen Fach Primary School is an English-medium community primary school for pupils aged 3 – 11. The school hosts a 20 place Specialist Resource Base for children with complex learning needs. The school is located at Heol Uchaf, Rhiwbina.

112. The designated number for the base is 20 and there are 19 pupils on roll at present.

113. To meet increasing demand for primary Specialist Resource Base places for learners with complex learning needs it is proposed to:
- increase the designated place number of the Special Resource Base at Llanishen Fach Primary School from 20 to 30 places from September 2023.
114. It is proposed that works would be undertaken to provide new accommodation and facilities, to facilitate the growth of the resource base.

### **Marlborough Primary School**

115. Marlborough Primary School is an English-medium community primary school for pupils aged 3-11. The school hosts a Specialist Resource Base, for pupils with moderate, severe and complex learning difficulties. The school is located at Blenheim Road, Penylan.
116. The designated number for the base is 20, however there are 28 pupils on roll.
117. To meet the increasing demand for primary specialist resource places for learners with moderate, severe and complex learning difficulties it is proposed to:
- increase the designated number at the Marlborough Primary School Specialist Resource Base from 20 to 30 places from September 2022.
118. Works have been undertaken to adapt existing accommodation within the school to increase the capacity of the resource base and to provide a sensory room.

### **Meadowbank Special School**

119. Meadowbank is a special school designated for up to 40 places for pupils aged 4-11 with speech language and communication needs and complex learning disabilities. The school is located in Llandaff North and admits pupils from across the authority. The number on roll at the school currently stands at 50.
120. To meet demand for primary special school places for complex learning disabilities, it is proposed to:
- increase the designated number of Meadowbank Special School from 40 to 98 places from September 2022
121. It is proposed that works would be undertaken to provide new accommodation and facilities, and adaptation of the existing accommodation, to facilitate the growth of the school.

### **Pentrebane Primary School**

122. Pentrebane Primary School is an English-medium community primary school for pupils aged 3-11. The school hosts a primary Autism Spectrum Condition Specialist Resource Base. The school is located at Beechley Drive, Pentrebane.
123. The designated number for the base is 20, however there are 24 pupils on roll.
124. To meet the increasing demand for primary specialist resource places for learners with ASC it is proposed to:
  - increase the designated number at the Pentrebane Primary School Autism Spectrum Condition Specialist Resource Base from 20 to 24 places from September 2022
125. It is proposed that works would be undertaken to improve and extend facilities and accommodation.

### **Springwood Primary School**

126. Springwood Primary School is an English-medium community primary school for pupils aged 3-11. The school hosts a primary Autism Spectrum Condition Specialist Resource Base. The school is located at Circle Way Llanedeyrn.
127. The designated number for the base is 20, however there are 28 pupils on roll.
128. To meet the increasing demand for primary specialist resource places for learners with Autism Spectrum Condition it is proposed to:
  - increase the designated number at Springwood Primary School Autism Spectrum Condition Specialist Resource Base from 20 to 28 places from September 2022.
129. Works have been undertaken to improve and adapt existing accommodation within the school.

### **The Hollies Special School**

130. The Hollies is a special school designated to provide 90 places for learners aged 4-11 with Autism Spectrum Conditions and physical and medical needs. The school is located at Bryn Heulog in Pentwyn.
131. The demand for specialist places at the school for learners with physical and medical needs has fallen over several years, while the city-wide demand for places for children with Autism Spectrum Conditions has increased. All pupils at the school are those with Autism Spectrum Conditions.

132. The Council consulted on proposals to extend the age range of The Hollies School from 4-11 to 4-14 and increase the designated place number to 138 in 2018 but these proposals were not progressed.
133. The designated number for the school is 90, however there are 119 pupils on roll.
134. To meet increasing demand for special school places for learners with Autism Spectrum Conditions it is proposed to:
- increase the designated number of The Hollies Special School from 90 to 119 places from September 2022
  - further increase the designated number of The Hollies Special School from 119 to 150 places from September 2023.
135. It is proposed that the school buildings would be extended to provide additional classrooms, in addition to works that are currently underway to improve existing facilities and to establish additional classrooms in the existing accommodation.

### **Health provision**

136. The proposals to expand specialist provision at the above school sites will have implications for health and other specialist services, working in partnership with schools to meet Additional Learning Needs. An additional factor is the ALN Reform Act 2018, which will introduce new responsibilities for health, education and social care to work together to coordinate assessment and provision. The Act 2018 will be implemented over a three-year period, beginning in September 2020.
137. In order to address these challenges together, the local authority and Cardiff and the Vale University Health Board are undertaking a joint review of health and specialist provision in Cardiff special schools and pupil referral units. The findings of the review, overseen by a project group of representatives from health, education, social services, schools, and parents, will inform the design of the specialist provision.

### **Addressing Condition and Suitability**

138. Cardiff has a very large education estate, with over 127 school properties. Many sites comprise of multiple blocks, constructed during different decades. A large number of primary, secondary and special schools are in a poor state of repair.
139. Approximately £17m, or 14%, of maintenance and condition issues of the estate have been addressed through Band A of the 21st Century Schools investment programme. There has been significant investment in the construction of two new high schools in the East and West of the City, new primary school provision and suitability works undertaken in primary schools.

140. This nonetheless leaves a significant maintenance backlog of approximately £68m, of which circa £8m is Equality Act 2010 compliance. The Local Authority's current spend on school asset renewal has been circa £4.7m per annum. In 2018-2019, the Council allocated an additional £25m of funding over the next 5 years to the school's asset renewal budget. This resource is allocated on a priority basis and is predominantly limited to keeping properties safe and watertight.
141. As part of the prioritisation of schools within the Band B programme, all properties across the school estate were given a rating from A to D for the following issues, with D being the worst category:
- Sufficiency of places available;
  - Condition of the school buildings;
  - Suitability of the environment for teaching.
142. Greenhill Special School is rated C for condition and D for suitability, with 'unsuitable' learning environments, which seriously inhibit the school's capacity to deliver the curriculum.
143. Replacing and significantly expanding this school is therefore essential if the Council is to fulfil its statutory responsibility to provide appropriate education for children with Additional Learning Needs.

### **Admissions Arrangements**

144. The Council would manage admissions to each of the special schools and Special Resource Bases in accordance with the ALN Code.

### **Impact of the proposals on the Welsh Language**

145. The level of special educational needs/ additional learning needs in the Welsh-medium sector has historically been lower than in the English medium sector. This has been changing over the last 4-5 years, with schools reporting an increased incidence of Additional Learning Needs, in all areas of need.
146. A review of Additional Learning Needs provision in the Welsh-medium sector was undertaken with Welsh medium schools in 2016 to inform the Welsh in Education Strategic Plan (WESP). Schools reported a small but significant number of examples of pupils with Additional Learning Needs leaving the Welsh-medium sector in order to access specialist resource bases or special schools. 7
147. There was also some anecdotal evidence to suggest that some families who would otherwise choose Welsh-medium education opt instead for English medium if their child has Additional Learning Needs, through concern that their child may need to transfer to the specialist sector at a later date.
148. Through the WESP, Cardiff has invested in specialist provision in the sector, including some capacity to respond to growing demand and to

generate more confidence in the availability of specialist provision in the sector.

149. A new primary base was established at Ysgol Gymraeg Pwll Coch, within the catchment area of Ysgol Gyfun Gymraeg Glantaf, where the secondary base is established. The two bases cater for learners with severe learning difficulties, providing a specialist curriculum and supporting a range of secondary needs including physical and medical needs, speech and language difficulties and autism.
150. In 2021 there is growing demand for resource bases for pupils with autism, who are average to high achievers, and would need a more integrative model of support than that provided by the two existing bases. There are currently 8 secondary aged learners, and 15 primary aged learners who would benefit from placement in an Autism Spectrum Condition base. This is a short term priority, given the risk that if current placements fail, the only option would be to offer a transfer to an English medium setting.
151. A primary wellbeing class has been established, hosted at Ysgol Gynradd Pen y Groes. The wellbeing class works flexibly to address needs in different age phases, or to provide an outreach model, depending on current need. 81. To support emotional health and wellbeing needs in secondary phase, a 'virtual' base/ Pupil Referral Unit has been piloted across the three secondary schools, starting in 2018. The pilot is due for further review in 2021.
152. The priority is to ensure the three schools have adequate facilities and accommodation to provide effective Step 3 and 4 provision, complemented by the virtual base/ Pupil Referral Unit. Medium term, the virtual base/ Pupil Referral Unit will eventually need a fixed location at one of the schools, with designated accommodation, to reduce the risk that young people with the most complex needs may need to leave the Welsh sector to access more specialist provision.
153. As the Welsh sector continues to grow it will be important to develop additional provision in anticipation of the need, to ensure Welsh-medium education is a genuine choice for learners with complex Additional Learning Needs.
154. The pool of Additional Learning Needs qualified and experienced teaching staff is limited in number, in comparison to the English sector. Any plan to develop Welsh medium specialist provision will need to be supported by an Additional Learning Needs Workforce Development Plan.
155. In accordance with the timetable set by Welsh Government, the Council is working closely with its partners on the Cardiff Welsh Education Forum to develop the new ten year WESP for the city. It is expected the plan will be available for public consultation in autumn 2021 before being submitted for approval to the Welsh Government in early 2022. The first ten year Plan will commence on 1 September 2022 and expire on 31

August 2032. Consultation on the draft WESP will seek views on how best to grow Welsh-medium education and on how to meet the local targets set by Welsh Government, in order to inform future proposals. The WESP will set out how the Council will increase the provision of Welsh-medium education for pupils with additional learning needs.

### **Learner Travel Arrangements**

156. There are no plans to change the Council's transport policy for school children.
157. Any pupils affected by the proposals would be offered the same support with transport as is provided throughout Cardiff in line with the same criteria that apply across Cardiff.
158. The Council's transport policy for school children can be viewed on the Council's website [www.cardiff.gov.uk/schooltransport](http://www.cardiff.gov.uk/schooltransport).
159. Any increase in demand for Learner Transport will require funding.

### **Community Impact**

160. The following are taken into account when considering a proposal: Public Open Space, parkland, noise and traffic congestion. Officers will work with schools and any community group to make sure that proposals avoid negative impacts if possible.
161. The schools that might be affected by the proposals are existing schools. Some offer after school activities and some have community organisations offering services from the school. It is not thought that there would be a negative impact on any of these activities.
162. With significant sports and wider leisure provision now established, or being developed, in many schools a key objective is to enable third party to access the sports facilities at schools, on a sustainable financial basis. Welsh Government's aim for shared facilities in community-focussed school are to:
  - Provide opportunities for the local community and sports organisations to participate in sport and physical activity for health improvement and development of their skills, particularly amongst low participant groups;
  - Operate in line with the national agenda for sport taking into account nationally adopted strategies;
  - Generate positive attitudes in sport and physical activity by young people and reducing the dropout rate in sports participation with age;
    - Increase the number of people of all ages and abilities participating in sport and physical activity including people with disabilities;
  - Use the facilities to encourage the range, quality and number of school sports club links and to stimulate competition that is inclusive of young people and adults;



- Provide affordable access to the facilities and to be self-financing and cost neutral in the first instance, generating sustainable income for the school in the future.
- The development of a viable model for all schools across the city to be accessed by the communities which they serve is needed.

### **Wellbeing of Future Generations**

163. In line with the Well-being of Future Generations Act Cardiff's Band B programme is committed to providing Local Schools for Local Children, together with encouraging use of sustainable modes to travel to schools, such as walking and cycling. Each School project takes into account key transport issues when they are being designed and the firm need to provide safer routes to encourage walking, cycling and other active travel modes to schools.
164. With the current investments in ICT across the city, student movements may be further reduced as mobile technology develops further allowing for flexible teaching methods. These have the potential to result in a more efficient Travel Plan and further contribute to the Council's targets to reduce its carbon emissions.
165. In order to maximise the long-term impact of this significant investment, any design taken forward for each school included in this proposal would be developed to ensure the delivery of high quality modern facilities that are able to respond to the current pupil populations needs and support the delivery of effective teaching and learning methods. They would also incorporate the flexibility to take account of changes depending on need as time progresses; such as changing demographics and pupil numbers, changing curriculum and changing types of pupil needs.

### **Local Member consultation (where appropriate)**

166. Additional learning needs provision is city-wide and members would be consulted as part of the public consultation.

### **Scrutiny Consideration**

167. The Children and Young People's Scrutiny Committee will consider this report on 13 October 2021. Any comments received will be circulated at the Cabinet meeting.

### **Reason for Recommendations**

168. To meet increasing demand for special school places for primary, secondary and Post-16 age learners with emotional health and wellbeing needs and complex learning needs.

## **Financial Implications**

169. This report outlines the request to proceed to public consultation on changes to ALN provision and schools intake within the 15 schools identified. Proceeding to consultation does not, in itself commit the Authority to future expenditure so there are no capital financial implications directly arising from this report. However, once a final options paper is provided it will be necessary for a full financial evaluation to be undertaken. This evaluation will consider both capital and revenue implications for both the totality and each individual proposal. The aim of this will be to provide assurance that having considered all relevant costs each proposal remains both affordable and does not have an impact on the budgetary pressures facing the Council.
170. The outline 21st Century Schools Band B Programme was approved by Cabinet in December 2017. At that time the overall value of the programme amounted to £284m, including the Greenhill Special School and Fairwater campus projects. The Welsh Government (WG) have not formally approved individual project budgets, but have given their in principle support to each project within Cardiff Council's programme.
171. The overall projected costs of the Band B projects are included in the current 21st Century Schools cash-flow forecast, to be partially funded through Welsh Government Grant (Greenhill – 75% and Fairwater – 70%). Any revenue costs in relation to these schemes, including capital financing costs will be funded through the SOP Revenue Reserve.
172. A capital receipts target of £25m is expected to fund part of the overall Band B programme. The source of these receipts has yet to be identified, but any site disposals resulting from building schools on new sites should be prioritised to fund Band B.
173. This report sets out proposals that create additional school places in the ALN setting across Cardiff Schools. These additional places will need to be funded from the existing delegated schools budget. This report highlights the high cost provision currently being incurred for this population of pupils either through Out of County Placements or enhanced CNE payments to mainstream pupils. Further work is required to establish whether or not the savings on Out of County Placements or enhanced CNE Payments will cover the additional costs of additional places and any associated Home to Transport costs.
174. Regarding revenue, there will need to be a review of the budget for each Specialist Resource Base or Special School which has an increase in the number of places. The due diligence undertaken must provide assurance that the additional places will be taken up and that the cost and numbers of Out of County Placements and CNE enhancements will reduce in order to ensure no significant pressure ongoing on school budgets. Over the medium term, Regular review and analysis needs to be undertaken comparing the projected number of places available to places taken up. This will ensure that the optimum benefits are achieved by the financial resources used.

175. Regarding capital implications, any further work required to accommodate increased pupil numbers will require full financial evaluation and an identified funding source. Should the Council be required to make a contribution towards these costs, these will need to be funded from within existing approved resources or factored into future iterations of the Council's Capital Programme. As part of the further evaluation that is required, it will be necessary to consider VAT implications arising from land and property ownership arrangements in relation to VA and Foundation schools. Should there be any cost associated with the required VAT treatment, these will need to be included within the overall financial envelope of the scheme.

### **Legal Implications**

176. Under the Education Act 1996, the Council has a general statutory obligation to promote high standards of education and to provide sufficient school places for pupils of compulsory school age, including appropriate provision for pupils with special educational needs (or additional learning needs). Parents have a right to express a preference for the school they wish their child to attend under section 86 School Standards and Framework Act 1998, but this does not provide a right to attend a certain school, as applications can still be refused where this would prejudice the provision of efficient education or the efficient use of resources.
177. A local authority can make school organisation proposals, including making 'regulated alterations' to a community school or a community special school, under sections 42-44 of the Schools Standards and Organisation (Wales) Act 2013. The proposals set out in the report constitute 'regulated alterations' and must be considered having regard to the provisions of the 2013 Act and the School Organisation Code 2018, which sets out factors to be considered in respect of different proposals, the statutory procedures, legal requirements and guidance.
178. Where an increase in a school's capacity is proposed, the Council must have regard to evidence of current or future need/demand in the area for additional places, with reference to the school's language category (and religious character / gender intake if applicable). The Code also includes specific factors to be considered in relation to proposals for the reorganisation of provision for Special Educational Needs (or Additional Learning Needs). Cabinet will need to be satisfied that all relevant factors are properly considered in relation to the proposals.
179. The Council is required, prior to publishing its proposals, to undertake a consultation on its proposals in accordance with section 48 of that Act and the School Organisation Code 2018. The recommendations seek authority to carry out that statutory consultation. Case law has established that the consultation process should: (i) be undertaken when proposals are still at a formative stage; (ii) include sufficient reasons and information for particular proposals to enable intelligent consideration and response; (iii) provide adequate time for consideration and response;

and; (iv) ensure that the product of consultation is conscientiously taken into account when the ultimate decision is taken.

180. The Schools Organisation Code sets out further detailed requirements and guidance in relation to the statutory consultation, including the requirement for publication of a consultation document (and the contents of that document), a minimum 42 days consultation period including at least 20 school days, and a list of statutory consultees, including parents, pupils, governing bodies, religious bodies, the Welsh Ministers and Estyn.
181. If the proposals are taken forward, the admission arrangements, including admission numbers and catchment areas, will need to be determined, following consultation, in accordance with the School Admission Code and the Education (Determination of Admission Arrangements) (Wales) Regulations 2006. In relation to the proposals which relate to religious schools, these may make provision for faith based oversubscription criteria, subject to compliance with the Code and equalities legislation.
182. The report refers to the need to undertake property transactions should matters proceed following consultation. It is expected that the detail of those proposals will be provided in a future report where they can be considered in detail at that time.
183. In considering the proposals, the Council must have regard to its public sector equality duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The Protected characteristics are: age, gender reassignment, sex, race – including ethnic or national origin, colour or nationality, disability, pregnancy and maternity, marriage and civil partnership, sexual orientation, religion or belief – including lack of belief. When taking strategic decisions, the Council also has a statutory duty to have due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage ('the Socio-Economic Duty' imposed under section 1 of the Equality Act 2010). In considering this, the Council must take into account the statutory guidance issued by the Welsh Ministers and must be able to demonstrate how it has discharged its duty. An Equalities Impact Assessment should be carried out to identify the equalities implications of the proposed decision, including inequalities arising from socio-economic disadvantage, and due regard should be given to the outcomes of the Equalities Impact Assessment.
184. The Council must also be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards and consider the impact of its proposals upon the Welsh language.
185. The Well-being of Future Generations (Wales) Act 2015 requires the Council to consider how the proposals will contribute towards meeting its

well-being objectives (set out in the Corporate Plan). Members must also be satisfied that the proposals comply with the sustainable development principle, which requires that the needs of the present are met without compromising the ability of future generations to meet their own needs.

186. Following the public consultation, the Council is required to issue a consultation report, setting out the issues raised by consultees and its response to those issues. At that stage, a further report is to be submitted to the Cabinet to decide how to proceed.

## **HR Implications**

### **Greenhill Special School**

187. There are significant HR implications arising from the proposal. Firstly, the proposed increase in pupil numbers for the school will require the Governing Body to plan for the workforce requirements in readiness for the expansions. The Governing Body will be encouraged to undertake this work in line with the School Organisation Planning HR Framework. HR People Services will provide advice, support and guidance to the Governing Body for the workforce planning and consequential recruitment processes. Where the Governing Body has adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of an increase in the numbers on roll will provide opportunities for school based staff on the school redeployment register. Secondly, the proposal includes the relocation of Greenhill Special School with the school proposed to operate dual site arrangements. This will require high levels of staff and trade union consultation; clear communication plans regarding the arrangements for the transition from one school site to another; in addition to staff involvement in the development of building specifications or designs.

### **Cardiff West Community High School**

188. HR People Services will work with the Governing Body to address the HR implications arising from the establishment of a Special Resource Base at the school and the resulting need for additional staffing. Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the establishment of the Special Resource Base will provide opportunities for school based staff on the school redeployment register.

### **Eastern High**

189. HR People Services will work with the Governing Body to address the HR implications arising from the establishment of a Special Resource Base at the school and the resulting need for additional staffing. Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the establishment of the Special Resource Base will provide opportunities for school based staff on the school redeployment register.

### Llanishen High School

190. HR People Services will work with the Governing Body to address the HR implications arising from the increase in the designated number of the Autism Special Resource Base at the school and the resulting need for additional staffing. Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the increase in the designated number of the Autism Special Resource Base will provide opportunities for school based staff on the school redeployment register.

### The Bishop of Llandaff Church in Wales High School

191. HR People Services will work with the Governing Body to address the HR implications arising from the increase in the designated number at The Marion Centre Special Resource Base at the school and the resulting need for additional staffing. The Governing Body would be encouraged to provide opportunities for school based staff on the school redeployment register arising as a consequence of any new vacancies resulting from the increase in the designated number at The Marion Centre Special Resource Base.

### Whitchurch High School

192. HR People Services will work with the Governing Body to address the HR implications arising from the increase in the designated number of the Special Resource Base at the school and the resulting need for additional staffing. Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the increase in the designated number of the Special Resource Base will provide opportunities for school based staff on the school redeployment register.

### Willows High School

193. HR People Services will work with the Governing Body to address the HR implications arising from the establishment of a Special Resource Base at the school and the resulting need for additional staffing. The Governing Body and the school's leadership team may require HR advice, guidance and support to ensure that its staffing structure is appropriate for a new build school. Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the establishment of the Special Resource Base will provide opportunities for school based staff on the school redeployment register.

### Ysgol Gyfun Gymraeg Glantaf

194. HR People Services will work with the Governing Body to address the HR implications arising from the establishment of an Autism Specialist Resource Base alongside the existing Specialist Resource Base at the school and the resulting need for additional staffing. Where the

Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the establishment of the Autism Specialist Resource Base will provide opportunities for school based staff on the school redeployment register.

#### Ty Gwyn Special School

195. The proposed increase in pupil numbers for the school will require the Governing Body to plan for the workforce requirements in readiness for the expansion. The Governing Body will be encouraged to undertake this work in line with the School Organisation Planning HR Framework. HR People Services will provide advice, support and guidance to the Governing Body for the workforce planning and consequential recruitment processes. Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of an increase in the numbers on roll will provide opportunities for school based staff on the school redeployment register.

#### Llanishen Fach Primary School

196. HR People Services will work with the Governing Body to address the HR implications arising from the increase in the designated number of the Special Resource Base at the school and the resulting need for additional staffing. Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the increase in the designated number of the Special Resource Base will provide opportunities for school based staff on the school redeployment register.

#### Marlborough Primary School

197. HR People Services will work with the Governing Body to address the HR implications arising from the increase in the designated number of the Special Resource Base at the school and the resulting need for additional staffing. Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the increase in the designated number of the Special Resource Base will provide opportunities for school based staff on the school redeployment register.

#### Meadowbank Special School

198. The proposed increase in pupil numbers for the school will require the Governing Body to plan for the workforce requirements in readiness for the expansion. The Governing Body will be encouraged to undertake this work in line with the School Organisation Planning HR Framework. HR People Services will provide advice, support and guidance to the Governing Body for the workforce planning and consequential recruitment processes. Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of an increase in the numbers on

roll will provide opportunities for school based staff on the school redeployment register.

#### Pentrebane Primary School

199. HR People Services will work with the Governing Body to address the HR implications arising from the increase in the designated number of the Autism Special Resource Base at the school and the resulting need for additional staffing. Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the increase in the designated number of the Autism Special Resource Base will provide opportunities for school based staff on the school redeployment register.

#### Springwood Primary School

200. HR People Services will work with the Governing Body to address the HR implications arising from the increase in the designated number of the Autism Special Resource Base at the school and the resulting need for additional staffing. Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the increase in the designated number of the Autism Special Resource Base will provide opportunities for school based staff on the school redeployment register.

#### The Hollies Special School

201. The proposed increase in pupil numbers for the school will require the Governing Body to plan for the workforce requirements in readiness for the expansion. The Governing Body will be encouraged to undertake this work in line with the School Organisation Planning HR Framework. HR People Services will provide advice, support and guidance to the Governing Body for the workforce planning and consequential recruitment processes. Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of an increase in the numbers on roll will provide opportunities for school based staff on the school redeployment register.

#### **Property Implications**

202. In supporting the School Organisation Programme, there is a requirement to review the existing school settings that will be potentially declared surplus in the future. Estates will continue to undertake the necessary due diligence in order to prepare sites and resolve any issues that may hamper this process in the future.
203. Since the acquisition of the Dutch Garden Centre site in 2018, the Estates team have continued to manage the existing tenants and any new lettings that have been administered in order to safeguard vacant possession as and when Education require the site. A number of site investigations have been undertaken recently, and this will continue as



further feasibility work progresses. Estate will liaise with the tenants accordingly.

204. The acquisition of the Ty Glas site and future management has been subject to a separate report in September 2021.

### **Traffic and Transport Implications**

205. The Council's Local Development Plan (2006-2026) includes a target of 50% of all journeys to be made by sustainable transport. Minimising the proportion of school journeys made by car and maximising opportunities for travel to school by active and sustainable modes can make an important contribution to achieving this target and reducing pressures on the transport network at peak times.
206. The individual needs of pupils at special schools and SRBs, together with the larger catchment sizes and distances travelled, necessarily limit the scope for high rates of active travel compared with mainstream schools. The existing high numbers of pupils eligible for Learner Transport are not generally expected to change significantly, however a proportion are able to, and may already, travel to school independently. These pupils as well as staff and school visitors would benefit from any required improvements in facilities for active travel to school or public transport facilities.
207. Each of the various school proposals to establish, expand or change designation of ALN facilities may require a Transport Assessment or Transport Statement which will identify measures to be included as part of the application to maximise travel by sustainable modes.
208. The Council's current Corporate Plan includes a commitment to every school in Cardiff developing an Active Travel Plan. Such a plan will identify actions by the school to support and encourage active travel to school and also any improvements to on-site and off-site infrastructure required to facilitate active journeys.
209. Increasing travel to school by active modes will have a positive impact on children's health and wellbeing and will support the delivery of key actions and outcomes under Goal 5 the Council's Child Friendly City Strategy (2018), which relates to ensuring access to safe outdoor environments for formal and informal play, walking, cycling and scooting and active travel to school.
210. A number of initiatives have successfully demonstrated support and encouragement for active and sustainable travel amongst the ALN cohort, including Independent Travel Training for older pupils, cycle maintenance and cycle training.
211. Some pupils are able to travel independently or with parent/carers and if resident within the two-mile qualifying distance may not be eligible for Learner Transport.

212. Provision of recommended improvements for active travel would benefit these pupils as well as staff and visitors to the sites.
213. Numbers of pupils who continue to use Learner Transport for their journey to school will be likely to increase in line with the trend for increasing numbers of pupils requiring places at special schools or specialist resource bases. Each school location with increased demand for Learner Transport vehicles will require suitable improved and / or expanded facilities for drop-off and pick-up within the site. The areas required would need to accommodate appropriate numbers of vehicles which may approximate to one taxi for a typical average of 3 pupils. In some cases minibuses may be suitable, but this is also dependent on individual pupil needs, home locations and co-ordination of routes.
214. Car parking provision would be in line with the Council's parking standards. Allocations for special schools and specialist resource bases are agreed on a case-by-case basis but requirements are expected to generally correlate with 1 car space per typical number of pupils in a class. This is in line with the standard 1 space per 30 pupils in mainstream schools, but results in a higher ratio of spaces due to the much smaller class sizes.

#### Transport matters relating to Greenhill School at the proposed Ty Glas site

215. From a transport standpoint the Ty Glas site would provide an excellent location for Greenhill School given its relatively central location, proximity to public transport routes and facilities, and potential for active travel connections. The development proposals will require a Transport Assessment which will identify measures to be included as part of the application to make further improvements and maximise travel by sustainable modes.
216. There is a significant proportion of current Greenhill pupils who live in the Llanishen and Gabalfa areas (and who do not require Learner Transport). There is therefore good potential for pupils as well as staff who live within a reasonable cycling or walking distance to travel to the site by active modes. Greenhill School has already developed its own Active Travel Plan well ahead of many mainstream schools.
217. Greenhill School pupils are supported by the Council's Independent Travel Training initiative where school pupils are supported in planning and making journeys to school independently. The site location near public transport services would lend it itself well to pupils being supported by this initiative.
218. Greenhill School forms part of the Cardiff Schools Bike Fleet project. Through this project, bespoke bike fleets are being placed in schools to allow everyone access to cycling. Greenhill School is shortly due to receive 16 standard bikes for pupils and 2 adult bikes, (as well as 5 scooters). The bikes will be used for extra cycle training of pupils and staff but also to embed cycling into the school culture as part of lessons and break times as well as using them to cycle to and from some of their

off-site activities. Greenhill School has embraced the project enthusiastically with the aim of encouraging their pupils to cycle to school and to cycle as part of curricula and extra curricula activity. Space for storage of the bike fleet will need to be provided within the new site as well as secure cycle parking in line with SPG requirements for pupils cycling to school. The scope for providing secure cycle storage facilities within the school building should be investigated in the first instance.

219. Special school learner transport will need appropriate facilities for drop-off and pick-up.
220. Learner Transport is currently provided by a number of taxis for the majority of Greenhill pupils. This was surveyed by the school as 92% in September 2020, although this was not a representative time and there is scope to reduce this proportion. Consideration will be required to where these vehicles can pick up and drop off on the proposed site in a safe area segregated from the pedestrian and cyclist entrances to avoid pedestrian/cyclist/vehicle conflict.
221. The site is located close to Ty Glas rail station on the Coryton line. The station can be accessed directly from within the industrial estate via Malvern Drive. The roads and junctions within the industrial estate are very wide which encourages high vehicle speeds so measures are required including crossing facilities and narrowing of junction radii to ensure that pupils travelling by train can safely access the school site on foot. The existing bus gate between Malvern Drive and Smith Road provides the opportunity for buses to access the site from both Ty Glas Avenue and Caerphilly Road so bus stop and bus drop off facilities should be located close the main vehicular access to the school on Parc Ty Glas.
222. Appropriate provision would need to be made for use of public transport services to access the school site. This would include safe waiting facilities for pupils and staff using scheduled and additional school bus services with safe pedestrian access to bus stops at locations convenient to the school, and assessment of existing crossings to confirm appropriate to the desire lines, type and level of use.

#### Transport matters relating to Greenhill School at the proposed Dutch Garden Centre site

223. The location of the Dutch Garden Centre site presents challenges in terms of transport sustainability. The development proposals will require a Transport Assessment which will identify measures to be included as part of the application to maximise travel by sustainable modes. The location across the grade separated junction 30 of the M4 from Pontprennau, the nearest residential area of Cardiff, will require provision of additional measures to accommodate access by any means other than vehicle.
224. Public transport does not currently serve this area to the north of the M4 and suitable bus service provision would need to be identified. Bus

access and safe waiting facilities for staff and any pupils travelling independently and using scheduled and additional school bus services will need to be provided, with safe pedestrian access to bus stops at locations convenient to the school, ideally adjacent to or inside the proposed site.

225. There are no pedestrian links to the site from the footways in the Cardiff Gate area further to the south side of junction 30. Consideration will be required for a pedestrian route across the grade separated junction roundabout and slip roads and links each side.
226. There are no existing or proposed cycling facilities linking to the site. Consideration will be required for suitable safe cycle facilities to access the north side of the junction and into the site. Existing facilities further south of the motorway would require improvement and additional extension up to and across the grade separated junction. Cycle network improvements further south are planned to be identified longer term (2027/28 and beyond) on St Mellons Road and on Pentwyn Link Road (but not currently planned to extend to the motorway junction).
227. Learner Transport will need appropriate facilities for drop-off and pick-up.
228. Learner Transport is currently provided by a number of taxis for the majority of Greenhill pupils. This was surveyed by the school as 92% in September 2020, although this was not a representative time and there is scope to reduce this proportion. Consideration will be required to where these vehicles can pick up and drop off on the proposed site in a safe area segregated from other vehicles and from pedestrian and cyclist accesses.

### **Equality Impact Assessment**

229. An initial Equality Impact Assessment has been carried out. It concluded that the proposed changes would not negatively affect a particular group in society. This assessment will be reviewed after consultation. A Statutory Screening Tool including Equality Impact Assessment is attached as Appendix 6.

### **RECOMMENDATIONS**

Cabinet is recommended to

1. authorise officers to consult on proposals as outlined in paragraph 54.
2. note the proposal for an increase in the designated number at The Marion Centre Specialist Resource Base, at The Bishop of Llandaff Church in Wales High School, from 42 to 66 places from September 2022.
3. note that the statutory consultation process to increase the designated number at the Marion Centre at The Bishop of Llandaff Church in Wales

High School is to be undertaken by the governing body of the school, and instruct officers to provide all reasonable assistance in this regard.

4. note the proposal for an increase in the designated number at Whitchurch High School Specialist Resource Base from 70 to 100 from September 2022
5. note that the statutory consultation process to increase the designated number at the Whitchurch High School Special Resource Base is to be undertaken by the governing body of the school, and instruct officers to provide all reasonable assistance in this regard.
6. authorise the Director of Education & Lifelong Learning to formally respond on behalf of the Council to the public consultations issued by the governing bodies of The Bishop of Llandaff Church in Wales High School and Whitchurch High School in due course.
7. note that officers will bring a report on the outcome of the consultation to a future meeting to seek authorisation as to whether to proceed to publish proposals in accordance with section 48 of The School Standards and Organisation (Wales) Act 2013.

<b>SENIOR RESPONSIBLE OFFICER</b>	Melanie Godfrey Director of Education & Lifelong Learning
	8 October 2021

*The following appendices are attached:*

- Appendix 1: Cabinet Report, 14 December 2017
- Appendix 2: Cabinet Report, 15 July 2021
- Appendix 3: Projections and Forecasts
- Appendix 4, Cabinet Report, 15 February 2018
- Appendix 5: Cabinet Report, 23 September 2021
- Appendix 6: Statutory Screening Tool

Mae'r dudalen hon yn wag yn fwriadol

## CARDIFF COUNCIL

### SCHOOL STANDARDS AND ORGANISATION (WALES) ACT 2013

#### ADDITIONAL LEARNING NEEDS PROVISION

#### MEADOWBANK SPECIAL SCHOOL

**NOTICE IS HEREBY GIVEN** in accordance with Section 44 of the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code, that Cardiff Council (herein after “the Authority”), having consulted such persons as appeared to them to be appropriate, propose to alter Meadowbank Special School, Colwill Road, Gabalfa, Cardiff, CF14 2QQ by:

- Increasing the designated number of Meadowbank Special School from 40 to 98.

It is proposed to implement the proposal from September 2022.

The school is currently maintained by Cardiff Council.

The Authority undertook a period of consultation before deciding to publish this proposal. A consultation report containing a summary of the issues raised by consultees and the Authority’s responses and the views of Estyn is available to view at:

[Agenda for Cabinet on Thursday, 10th March, 2022, 2.00 pm : City of Cardiff Council \(moderngov.co.uk\)](https://www.moderngov.co.uk/Agenda-for-Cabinet-on-Thursday-10th-March-2022-2.00-pm-City-of-Cardiff-Council)

The current pupil capacity of the school is 40. The current number of pupils at the school is 48.

The proposed capacity once the proposal is implemented will be 98.

The school will continue to provide places for learners with speech and language and communication needs and complex learning needs aged 4 – 11.

Children are taught in mixed classes and the numbers per age group may vary however the overall number would not exceed 98.

There are no plans to change the Council’s policy on the admission of children to schools as a result of these proposals.

Admissions to the school are managed by the local authority and subject to a statement of Special Educational Needs (SEN) or Individual Development Plan (IDP) as appropriate.

Any arrangements for the transport of pupils will be made in accordance with the Authority’s existing policies on school transport.

Within a period of 28 days of the date of publication of these proposals, that is to say by 05 July 2022, any person may object to these proposals.

Objections should be sent to the Director of Education and Lifelong Learning, Cardiff Council, County Hall, Atlantic Wharf, Cardiff CF10 4UW.

Objections may also be sent to the Director of Education and Lifelong Learning, Cardiff Council using the following e-mail address: [SchoolResponses@cardiff.gov.uk](mailto:SchoolResponses@cardiff.gov.uk)

Please note that any such objection must contain the full name and postal address of the objector.

The Authority will publish a summary of any such objections made (and not withdrawn in writing) within the objection period, together with their observations thereon, before the end of 7 days beginning with the day the proposal is determined.

Dated this 08 day of June 2022

Signed: Davina Fiore  
Director of Legal, Governance and Monitoring Officer  
For Cardiff Council

### EXPLANATORY NOTE

(This does not form part of the Notice but is intended to explain its general meanings)

Meadowbank School is a special school located at Colwill Road in Llandaff North. The school admits pupils from across the authority.

The school is designated for up to 40 places for pupils aged 4 -11 with speech and language and communication needs and complex learning needs.

To meet increasing demand for special school places for learners with complex learning needs it is proposed to increase the designated number of Meadowbank Special School from 40 to 98 from September 2022.

The number of pupils at the school is 48 with the additional children being accommodated within the existing accommodation.

It is proposed that works would be undertaken to provide new accommodation and facilities and adaptation of the existing accommodation, to facilitate the growth of the school. This would allow for up to 98 children to be accommodated.

In addition to the proposed increase in designated places at Meadowbank Special School, additional places for pupils with complex learning needs and autism spectrum condition have been proposed for a number of schools within the local authority. Details of these proposals and copies of the statutory notices can be seen at [Complex Learning Needs/Autism Spectrum Condition provision \(cardiff.gov.uk\)](http://Complex Learning Needs/Autism Spectrum Condition provision (cardiff.gov.uk))



## CARDIFF COUNCIL

### SCHOOL STANDARDS AND ORGANISATION (WALES) ACT 2013

#### ADDITIONAL LEARNING NEEDS PROVISION

#### MARLBOROUGH PRIMARY SCHOOL

**NOTICE IS HEREBY GIVEN** in accordance with Section 42 of the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code, that Cardiff Council (herein after “the Authority”), having consulted such persons as appeared to them to be appropriate, propose to alter Marlborough Primary School, Blenheim Road, Roath, Cardiff, CF23 5BU by:

- Increasing the designated number of the Specialist Resource Base for children with severe and complex learning needs at Marlborough Primary School from 20 to 30 places.

It is proposed to implement the proposal from September 2022.

The school is currently maintained by Cardiff Council.

The Authority undertook a period of consultation before deciding to publish this proposal. A consultation report containing a summary of the issues raised by consultees and the Authority’s responses and the views of Estyn is available to view at:

[Agenda for Cabinet on Thursday, 10th March, 2022, 2.00 pm : City of Cardiff Council \(modern.gov.co.uk\)](http://modern.gov.co.uk)

The current school capacity is 420 places for children aged 4-11. There are 64 nursery places. The current number of pupils at the school is 443 (including children attending the Specialist Resource Base) (4 – 11) and 62 (nursery aged).

There are 20 places at the Specialist Resource Base. The current number of pupils at the resource base is 28.

There are no plans to change the Council’s policy on the admission of children to schools as a result of these proposals.

Admissions to the specialist resource base are managed by the local authority and subject to a statement of Special Educational Needs (SEN) or Individual Development Plan (IDP) as appropriate.

Admissions to the specialist resource base would be separate to admission to the main school and would be in addition to the Published Admission Number (PAN)

Any arrangements for the transport of pupils will be made in accordance with the Authority’s existing policies on school transport.

Within a period of 28 days of the date of publication of these proposals, that is to say by 05 July 2022, any person may object to these proposals.

Objections should be sent to the Director of Education and Lifelong Learning, Cardiff Council, County Hall, Atlantic Wharf, Cardiff CF10 4UW.

Objections may also be sent to the Director of Education and Lifelong Learning, Cardiff Council using the following e-mail address: [SchoolResponses@cardiff.gov.uk](mailto:SchoolResponses@cardiff.gov.uk)

Please note that any such objection must contain the full name and postal address of the objector.

The Authority will publish a summary of any such objections made (and not withdrawn in writing) within the objection period, together with their observations thereon, before the end of 7 days beginning with the day the proposal is determined.

Dated this 08 day of June 2022

Signed: Davina Fiore  
Director of Legal, Governance and Monitoring Officer  
For Cardiff Council

### EXPLANATORY NOTE

(This does not form part of the Notice but is intended to explain its general meanings)

To meet the demand for Specialist Resource Base places for learners aged 4 -11 with Autism Spectrum Condition it is proposed to increase the designated number at the Marlborough Primary School Specialist Resource Base from 20 to 30 spaces from September 2022.

Works have been undertaken to adapt existing accommodation within the school to increase the capacity of the resource base and to provide a sensory room.

In addition to the proposed increase in designated places at the specialist resource base for children with severe and complex learning needs at Marlborough Primary School, further places for pupils with complex learning needs and autism spectrum condition have been proposed for a number of schools within the local authority. Details of these proposals and copies of the statutory notices can be seen at [Complex Learning Needs/Autism Spectrum Condition provision \(cardiff.gov.uk\)](http://Complex Learning Needs/Autism Spectrum Condition provision (cardiff.gov.uk))

## CARDIFF COUNCIL

### SCHOOL STANDARDS AND ORGANISATION (WALES) ACT 2013

#### ADDITIONAL LEARNING NEEDS PROVISION

#### SPRINGWOOD PRIMARY SCHOOL

**NOTICE IS HEREBY GIVEN** in accordance with Section 42 of the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code, that Cardiff Council (herein after “the Authority”), having consulted such persons as appeared to them to be appropriate, propose to alter Springwood Primary School, Pennsylvania, Llanedeyrn, Cardiff, CF23 9LS by:

- Increasing the designated number of the Specialist Resource Base for children with Autism Spectrum Condition at Springwood Primary School from 20 to 28 places.

It is proposed to implement the proposal from September 2022.

The school is currently maintained by Cardiff Council.

The Authority undertook a period of consultation before deciding to publish this proposal. A consultation report containing a summary of the issues raised by consultees and the Authority’s responses and the views of Estyn on the proposed changes is available to view at:

[Agenda for Cabinet on Thursday, 10th March, 2022, 2.00 pm : City of Cardiff Council \(moderngov.co.uk\)](https://www.moderngov.co.uk/agenda/2022/03/10/cabinet)

The current school capacity is 420 places for children aged 4-11. There are 48 nursery places. The current number of pupils at the school is 231 (4 – 11) and 28 (nursery aged).

There are 20 places at the Specialist Resource Base. The current number of pupils at the resource base is 28.

There are no plans to change the Council’s policy on the admission of children to schools as a result of these proposals.

Admissions to the specialist resource base are managed by the local authority and subject to a statement of Special Educational Needs (SEN) or Individual Development Plan (IDP) as appropriate.

Admissions to the specialist resource base would be separate to admission to the main school and would be in addition to the Published Admission Number (PAN)

Any arrangements for the transport of pupils will be made in accordance with the Authority’s existing policies on school transport.

Within a period of 28 days of the date of publication of these proposals, that is to say by 05 July 2022, any person may object to these proposals.

Objections should be sent to the Director of Education and Lifelong Learning, Cardiff Council, County Hall, Atlantic Wharf, Cardiff CF10 4UW.

Objections may also be sent to the Director of Education and Lifelong Learning, Cardiff Council using the following e-mail address: [SchoolResponses@cardiff.gov.uk](mailto:SchoolResponses@cardiff.gov.uk)

Please note that any such objection must contain the full name and postal address of the objector.

The Authority will publish a summary of any such objections made (and not withdrawn in writing) within the objection period, together with their observations thereon, before the end of 7 days beginning with the day the proposal is determined.

Dated this 08 day of June 2022

Signed: Davina Fiore  
Director of Legal, Governance and Monitoring Officer  
For Cardiff Council

### **EXPLANATORY NOTE**

(This does not form part of the Notice but is intended to explain its general meanings)

To meet the demand for Specialist Resource Base places for learners aged 4 -11 with Autism Spectrum Condition it is proposed to increase the designated number at the Springwood Primary School Specialist Resource Base from 20 to 28 spaces from September 2022.

Works have been undertaken to improve and adapt existing accommodation within the school.

In addition to the proposed increase in designated places at the specialist resource base for children with Autism Spectrum Condition at Springwood Primary School, further places for pupils with complex learning needs and autism spectrum condition have been proposed for a number of schools within the local authority. Details of these proposals and copies of the statutory notices can be seen at [Complex Learning Needs/Autism Spectrum Condition provision \(cardiff.gov.uk\)](http://Complex Learning Needs/Autism Spectrum Condition provision (cardiff.gov.uk))

# 21st Century Schools Consultation Document 2021

PROVISION FOR CHILDREN AND YOUNG PEOPLE  
WITH ADDITIONAL LEARNING NEEDS:  
COMPLEX LEARNING NEEDS AND AUTISM SPECTRUM  
CONDITION PROVISION FOR LEARNERS AGED 11-19

14 DECEMBER 2021 – 1 FEBRUARY 2022



This document can be made available in Braille.  
A summary version of this document is available at [www.cardiff.gov.uk/ALNSchoolproposals](http://www.cardiff.gov.uk/ALNSchoolproposals)  
Information can also be made available in other community languages if needed.  
Please contact us on 029 2087 2720 to arrange this.



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- The number of places at the school
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- Condition and suitability of school buildings

### Quality and Standards

- Estyn
- Welsh Government Categorisation of Schools
- Willows High School

### How would standards at the schools be affected by the changes?

- Standards
- Teaching and Learning Experiences
- Care support and guidance
- Leadership and management

### Additional support for pupils

- Impact on pupils with Additional Learning Needs (ALN)
- How would support for pupils with English as an Additional Language be affected?
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### What are the benefits of the proposed change?

### Potential disadvantages of the proposed change

### Alternative options considered

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### Transport Matters

### Have your say

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- The number of places at the school
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### Quality and Standards

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### How would standards at the schools be affected by the changes?

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- How would support for pupils with English as an Additional Language be affected?
- How would pupils receiving Free School Meals be affected?
- How would Minority Ethnic pupils be affected?

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### Have your say

## Proposal for Additional Specialist Resource Base places at The Marion Centre, The Bishop of Llandaff Church in Wales High School

- The number of places at the school
- Demand for places at the school
- Condition and suitability of school buildings

### Quality and Standards

- Estyn
- Welsh Government Categorisation of Schools
- The Bishop of Llandaff Church in Wales High School

### How would standards at the schools be affected by the changes?

- Standards
- Teaching and Learning Experiences
- Care support and guidance
- Leadership and management

### Additional support for pupils

- Impact on pupils with Additional Learning Needs (ALN)
- How would support for pupils with English as an Additional Language be affected?
- How would pupils receiving Free School Meals be affected?
- How would Minority Ethnic pupils be affected?

### What are the benefits of the proposed change?

### Potential disadvantages of the proposed change

### Alternative options considered

### Human Resources Matters

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### Have your say

## Proposal for the establishment of a Specialist Resource Base at Ysgol Gyfun Gymraeg

- The number of places at the school
- Demand for places at the school
- Condition and suitability of school buildings

### Quality and Standards

- Estyn
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### How would standards at the schools be affected by the changes?

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- Care support and guidance
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### Additional support for pupils

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## Introduction

### What is this booklet about?

This booklet is for parents/ carers, school staff, school governors and anyone who has an interest in education in Cardiff. It will be of particular interest to parents/ carers of children and young people attending or expecting to attend special schools or Specialist Resources Bases and those that have or currently work with children and young people with Additional Learning Needs (ALN).

It sets out a range of proposals to increase the number of specialist resource places for learners aged 11-19 with complex learning needs, and autism spectrum condition and the reasons for these proposed changes.

### What are we proposing to do?

To meet the demand for secondary specialist resource places for learners with complex learning needs it is proposed to:

- **increase the designated number at the Whitchurch High School Specialist Resource Base from 70 to 100 from September 2022**
- **establish a 30 place Specialist Resource Base at Willows High School from September 2023**

To meet demand for secondary specialist resource provision for learners with Autism Spectrum Condition it is proposed to:

- **increase the designated number at the Llanishen High School Specialist Resource Base from 20 to 45 places from September 2022**
- **increase the designated number at The Marion Centre Specialist Resource Base from 42 to 66 places from September 2022**
- **establish a 30 place Resource Base at Ysgol Gyfun Gymraeg Glantaf alongside the existing 30 place Specialist Resource Base from September 2023**

Please note that the development of these proposals is at an early stage. Any detailed school design or site layouts would be considered at a later date. There would be opportunities to comment on detailed plans at the pre-planning and planning application stages, should the proposal be progressed.

We are also consulting on separate proposals to increase provision for learners with Emotional Health and Wellbeing Needs aged 11 – 19 and provision for learners with complex learning needs and autism spectrum condition aged 4 – 19 at a range of schools across Cardiff.

You can see more detail on these proposals at [www.cardiff.gov.uk/ALNschoollproposals](http://www.cardiff.gov.uk/ALNschoollproposals)

## Consultation

### Who are we consulting with?

The consultation process must follow the Welsh Government guidelines as set out in the School Organisation Code 2018.

As part of this we are asking people what they think about the changes we are proposing. There are a number of ways people can tell us their views.

**Table 1: Groups the Council is consulting with**

Children and young people	Welsh Ministers
Parents/carers	Police & Crime Commissioner
School staff	Central South Consortium Joint Education Service (CSCJES)
School Governing Bodies	Welsh Language Commissioner
Local residents	Rhieni dros Addysg Gymraeg (RhAG)
Community Councils	Trade Unions
Local Members/Assembly Members (AMs)/ Regional Assembly Members/Member of Parliament (MPs)	Childcare providers
Diocesan Directors of Education	Mudiad Meithrin
Neighbouring Authorities	Wales Pre-School Providers Association
Neighbouring Primary and Secondary schools within Cardiff	Clybiau Plant Cymru Kids Club
Estyn	National Day Nurseries Association
Communities First Partnership	Welsh Education Forum
Cardiff and Vale Health Board	Traffic Commissioner for Wales
Local businesses/organisations	Voluntary Sector Organisations

### Views of children and young people on the proposed changes

Cardiff is a Child Friendly City, and the views of children and young people are key to the way education is delivered. It is important that when bringing forward proposals, suitable arrangements are made to consult with pupils. The Council will consult with pupils in the schools included as part of these proposals and the information gathered in these sessions will be included in the final consultation report.

### How you can find out more and let us know your views?

This consultation document and a consultation response form are available on the Council website at [www.cardiff.gov.uk/ALNschoollproposals](http://www.cardiff.gov.uk/ALNschoollproposals)

If you are unable to access the documents online, printed copies will be available by post on request. You may request a copy by e-mailing [schoolresponses@cardiff.gov.uk](mailto:schoolresponses@cardiff.gov.uk) or by telephoning **029 2087 2720**.



We will advise families with children at the associated schools on how they can access a copy of the document.

Information will also be provided to residents and businesses in close proximity to the school sites included in the proposals.

Online meetings will be held where the changes we are proposing will be explained. You will have the opportunity to ask questions as part of these sessions. If you would like to attend an online meeting, please contact us via e-mail to [schoolresponses@cardiff.gov.uk](mailto:schoolresponses@cardiff.gov.uk) confirming which meeting you would like to attend and we will provide a link and instructions on how you can access this meeting.

Council officers will meet with the Governing Bodies and staff of the associated schools.

You can also write to the Council to tell us what you think.

The dates of the public consultation meetings are set out below:

Table 2: Consultation Meeting Dates		
Nature of consultation	Date/Time	Venue
Public meeting	Wednesday 19 January 2022 5:30pm	Online via Microsoft Teams
Drop in sessions	On request by emailing <a href="mailto:schoolresponses@cardiff.gov.uk">schoolresponses@cardiff.gov.uk</a>	Online via Microsoft Teams

### Your views are important to us

Your views matter and we want you to tell us what you think about the changes we have suggested in this document.

You can do this by:

- Attending one of the meetings or drop-in sessions listed above.
- Completing the online response form at [www.cardiff.gov.uk/ALNSchoolproposals](http://www.cardiff.gov.uk/ALNSchoolproposals)
- Completing the consultation response form, which you can find on page 79.
- Contacting the School Organisation Planning Team by e-mail to [schoolresponses@cardiff.gov.uk](mailto:schoolresponses@cardiff.gov.uk), by telephone on (029) 2087 2720 or by post to Room 401, County Hall, Cardiff, CF10 4UW. This can include requesting an officer call back if you have a specific question that you feel you would like further information about.

### The closing date for responses to this consultation is 1 February 2022

The Council is not able to consider any consultation responses received after this date.

## Explanation of Terms used in this document

Please note the following terms used throughout this document:

**Admission Number** - all maintained schools admit pupils up to at least their Published Admission Number. The admission number is the number of pupil places available in each year group.

**ALN** - Additional Learning Needs. A child or young person is considered to have Additional Learning Needs if they have difficulties that have a significant long-term impact on their learning. Difficulties may be related to learning; communication and interaction; a physical or sensory disability; or behavioural emotional and social development. (ALN is sometimes referred to as Special Educational Needs).

**Community Schools** – a primary or secondary school where the Council arranges school admissions.

**Complex Learning Needs** - children and young people with Complex Learning Needs have a range of issues & combination of layered needs. These could include needs related to learning, communication, physical or sensory disabilities.

**Emotional Health and Wellbeing Needs** – children and young people with Emotional Health and Wellbeing Needs have issues with thinking, feeling and behaving. This impacts on managing how life affects them, how they cope, how they engage with others, the choices they make. Sometimes this is as a result of trauma. Children and young people may display anxiety, low self-esteem, school phobia, or behavioural difficulties.

**Education Other Than at School (EOTAS)** - education provision to meet specific needs of pupils who, for various reasons, cannot attend a mainstream or special school. EOTAS refers to education provided by the local authority and does not encompass elective home education.

**Mainstream** - a mainstream school is a school run by the Council which is not a special school. Council maintained mainstream/special schools are not selective and do not require students to pay fees.

**Number on Roll data** - the number of pupils at a school (not including nursery pupils).

**PLASC** - Pupil Level Annual School Census. In January of every year, the Welsh Government collects information from schools. This includes the number of pupils at each school, their age groups, home addresses, ethnicity, and data on Welsh language, Special Educational Needs, first language and pupils who have Free School Meals.

**School Action** - when a class or subject teacher gives extra support to a pupil with additional learning needs.

**School Action Plus** - when outside specialists help the class or school staff to give extra support to a pupil with additional learning needs. This is different or additional to the support provided through School Action.

**Special School** – a school for children with an additional learning need or disability, whose needs cannot be met in a mainstream school. The pupils at a special school have a statement of SEN, or an Individual Development Plan (IDP).

**Specialist Resource Base** - A small class in a mainstream school for pupils with significant additional learning needs. All pupils attending a specialist resource base have a statement of SEN and are taught by specialist teachers and learning support assistants, and have opportunities to learn, play or socialise with other mainstream pupils.

**Wellbeing Classes** - Cardiff also funds several wellbeing classes which provide short term intensive support for children and young people displaying emotional health and wellbeing needs, to support their continued placement in their local mainstream school. Placement in a Wellbeing Class is temporary for one year: the child remains on roll at their local school, and they are supported to return full time to their local school by the end of the programme.

## Background

Cardiff's 2030 vision for education and learning in Cardiff sets a goal of A Learning Entitlement, in which all children and young people are able to:

- access appropriate routes into education and learning opportunities
- thrive and fulfil their potential
- realise their individual dreams and ambitions

In order to improve outcomes for Cardiff's most vulnerable learners, many of whom face barriers to engagement in education and learning, addressing inequality is key.

Cardiff's 2030 vision is available to view at [cardiff.gov.uk/cardiff2030](http://cardiff.gov.uk/cardiff2030)

## The Approach to Supporting Additional Learning Needs in Cardiff

An effective, inclusive approach to supporting additional learning needs in Cardiff includes the following principles:

- Schools and settings that deliver an innovative curriculum with effective whole school approaches to teaching and learning, emotional health and wellbeing.
- Excellent specialist services to enhance the capacity of schools and other settings to include children and young people with a range of additional learning needs.
- Effective early identification and research-based intervention to prevent the escalation of additional learning needs wherever possible.
- High levels of accessibility in every school building with sufficient flexible accommodation in every school appropriate to the age and stage of learning.

- Strong partnerships to ensure a holistic, collaborative response to a child or young person's additional learning needs (including health, children and adult services, early years and Further Education providers).
- Effective multi-agency transition planning at every stage, from early years through to primary, secondary, post 16 and adult destinations, to support admission without delay.

The number of children and young people requiring specialist placement as a result of their learning disabilities has been increasing in Cardiff over the last 5 years, and steps were taken in 2018 to increase the number of specialist places available.

The proposals set out in this consultation document seek to improve access to education in line with the above principles of inclusion.

## Sufficiency in the Special Sector

Cardiff Council is committed to the principles of inclusion. The majority of learners with Additional Learning Needs (ALN) attend a local mainstream school, and benefit from effective Additional Learning Provision (ALP). These learners do not need to attend a special school or Specialist Resource Base.

However, it is recognised that in order to thrive and fulfil their potential, children and young people with the most complex additional learning needs require access to the specialist environments and expertise of a special school or Specialist Resource Base

The number of pupils with severe and complex needs, who need a place in a special school or specialist resource base has continued to grow.

This is because of:

- Pupil population changes, with larger cohorts of primary school age pupils now moving through to the secondary age phase.
- Improved survival rates for children born with significant disabilities, resulting in a higher number of pupils with severe and complex disabilities.
- Increased complexity in needs, which has meant that the demand for specialist provision has continued to grow. The range of expertise, specialist support and facilities required in special schools and specialist resource bases has also increased.
- Increased incidence and identification of specific needs such as autism, ADHD, physical disabilities and sensory impairments.
- More children and young people with emotional health and wellbeing needs. This was a trend before COVID 19 but has been exacerbated by school closures and other measures to manage the pandemic.

At present, both primary and secondary schools in Cardiff host specialist resource base provision. Some are designated to support children with complex learning needs who require a specialist curriculum taught in a small class environment; some are designated for learners with autism spectrum condition or hearing impairments who require specialist support to access mainstream learning, with access to a nurturing base for some learning and unstructured time.

The purpose of a Specialist Resource Base is to enable learners with learning difficulties to succeed in a mainstream school environment. Pupils are taught in a small class by specialist staff and benefit from a specialist curriculum, while benefiting from the full range of education opportunities available to all pupils at the school.

At the end of March 2021, there were 2,265 children in Cardiff with a statement of Special Education Needs. As the population grows, so will the number of children and young people with significant and complex Additional Learning Needs.

In 2020/21:

- 1,116 places in Specialist Resource Bases or special schools were funded by Cardiff Council.
- 48 temporary places for learners were available in Wellbeing Classes and Speech and Language Classes
- 90 places were available in the Pupil Referral Unit (PRU)

Whilst there are a number of existing specialist settings across Cardiff, there are not enough places available. The number of children who would benefit from a place is projected to increase over coming years.

As there are not enough special school places in Cardiff, the Council has also funded some places at special schools in other Council areas or in independent schools. The total spend on these places was £6.3m in 2020/21. The budget for 2021/22 for these types of places is currently set at £7.3m.

Spending on independent places and special school places in neighbouring Council areas has grown to £3.8m in 2020/21. Without investment in additional places, the cost of these places would be expected to grow significantly in future years.

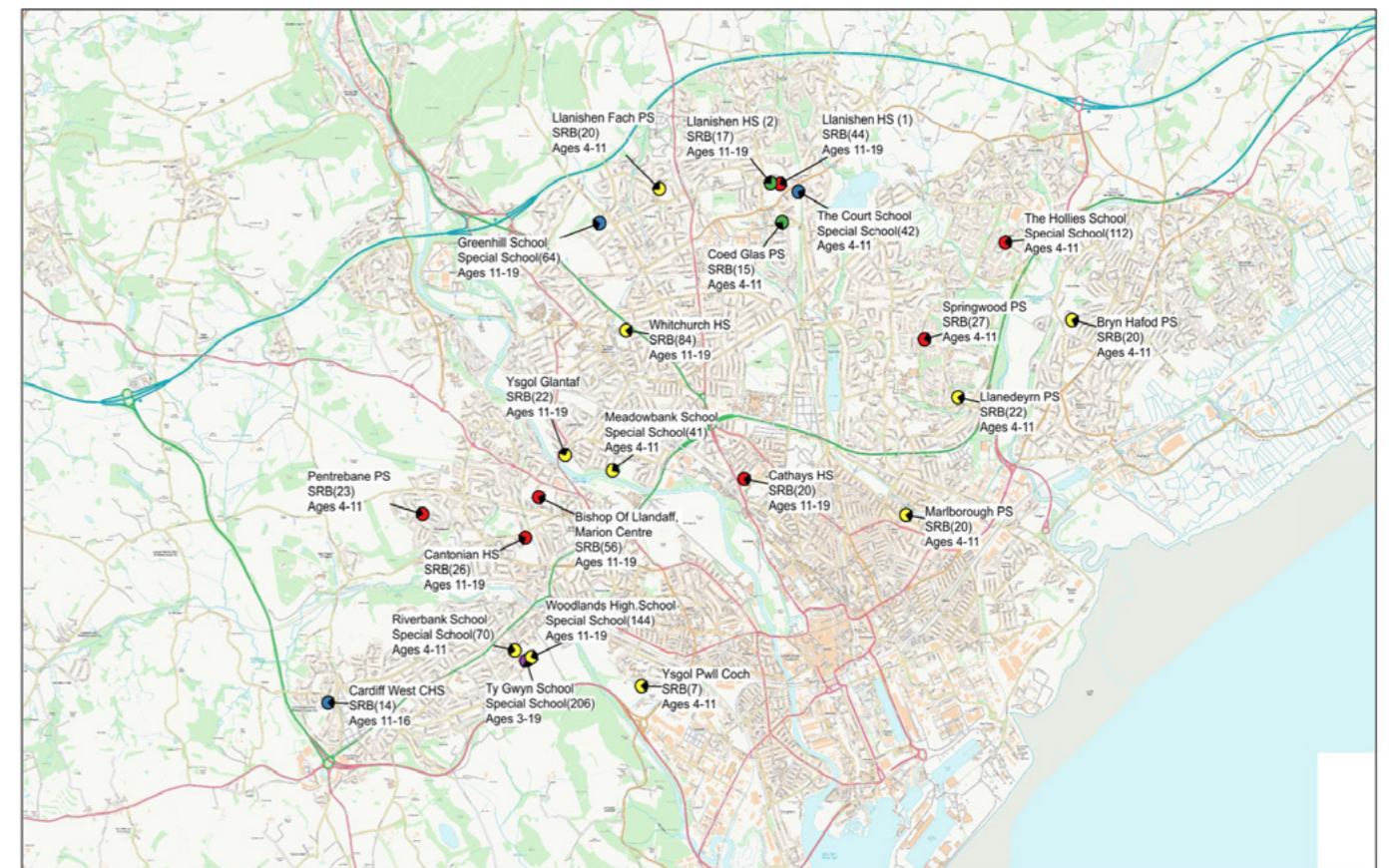
## Geographical distribution of specialist provision

The location of Specialist Resource Bases and Wellbeing Classes is not well distributed across the city.

The lack of Specialist Resource Bases in some localities can disadvantage learners living in those areas. Some families are unfamiliar with the areas where provision is located. Parents or carers may lack the means to travel easily to those areas.

A better distribution of specialist resource bases across the city would improve access for pupils. It would reduce travel times for many pupils, as well as increasing the number of places available.

## Cardiff Special Schools and SRBs 2021



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## Complex Learning Needs and Autism Spectrum Condition places for learners aged 11-19

### Current provision

In 2020/21 there is a total of 461 specialist Complex Learning Needs and Autism Spectrum Condition places for learners aged 11-19 in Cardiff maintained schools. Proposals for Woodlands High School were approved by Welsh Government in September 2019 and will provide 100 additional places for young people with Complex Learning Needs.

Table 3: Secondary Complex Learning Needs and Autism Spectrum Condition provision currently available in Cardiff	
Secondary places	Age 11-19 Complex Learning Needs/ Autism Spectrum Condition capacity (2021/22)
Ty Gwyn School	123
Woodlands High School	140
Whitchurch High School Specialist Resource Base	70
The Marion Centre Specialist Resource Base	42
Cathays High School Specialist Resource Base	16
Cantonian High School Specialist Resource Base	20
Llanishen High School Specialist Resource Base	20
Ysgol Gyfun Gymraeg Glantaf Specialist Resource Base	30
<b>Capacity</b>	<b>461</b>

\*Total capacity of Ty Gwyn School is 198 places aged 3-19, of which approximately 123 places serve pupils aged 11-19

## Demand for places

### Projected Complex Learning Needs/ Autism Spectrum Condition Secondary Phase Demand

Table 4: Projected future demand for Complex Learning Needs/ Autism Spectrum Condition places for young people aged 11-19

Secondary places	2021/22	2022/23	2023/24	2024/25	2025/26
Projected demand	580	600	617	623	629
Projected demand (+10%)	638	660	679	685	692

Taking account of all children needing places including those placed out of county and in mainstream awaiting a specialist placement, the demand for places is estimated to be circa 580 in 2021/22, rising to 629 by 2025/26.

Allowing for a 10% surplus to support flexibility, the ideal position would be 638 places in 2021/22 and 692 places by 2025/26.

In summary, there is an estimated deficit of 177 places in 2021/ 2022, reducing to 131 places by 2025/ 2026.

## Proposal for Additional Specialist Resource Base places at Whitchurch High School

### Proposal for Additional Specialist Resource Base places at Whitchurch High School

Whitchurch High School is an English-medium Foundation school for pupils aged 11-18. The school is located over two sites at Manor Way and Penlline Road in Whitchurch.

The school hosts a Specialist Resource Base designated for complex learning needs.

To meet the demand for Specialist Resource Base places for learners with complex learning needs aged 11-19 it is proposed to:

- increase the designated number at Whitchurch High School Specialist Resource Base from 70 to 100 from September 2022.

It is proposed that the current specialist resource base accommodation would be improved and refurbished, creating additional classrooms and learning spaces. Some of this work has already been undertaken in order that the school, and the Council, can ensure sufficient places were available for children with complex learning needs.

#### The number of places at the school

Table 5 below provides details of places available at Whitchurch High School

Name of school	Current Published Capacity (age 11 – 16)	Places per year group (age 11 – 16)	Sixth form places	Language medium and Category of School
Whitchurch High School (mainstream places)	1950	390	450	English-medium foundation secondary school
Whitchurch High School (Specialist Resource Base places)	70			

The current capacity of Whitchurch High School is 2,400 places and the school had 2416 pupils on roll in April 2021, including pupils in the Specialist Resource Base.

The current capacity of the Specialist Resource Base at Whitchurch High School is 70 places however the base had 96 learners on roll in October 2021.



### Demand for places at the school

Table 6 below sets out details of recent and projected numbers on roll

School	Numbers on Roll (PLASC)					Pupil projections*				
	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
Whitchurch High School mainstream places	2206	2229	2270	2289	2335	2308	2308	2296	2289	2287
Whitchurch High School Specialist Resource Base places	49	56	69	84	81	90	91	100	100	100

\* School pupil numbers based on local catchment population projections and historical patterns of demand

### Condition and Suitability of School Buildings

All schools in Cardiff are given a Condition rating from A (performing as intended / operating efficiently) to D (life expired / risk of imminent failure)

Schools in Cardiff are also given a Suitability rating from A (good – facilities suitable for teaching, learning & wellbeing) to D (bad – building seriously inhibit the staff’s ability to deliver the curriculum).

Table 7: Condition and suitability gradings

Grading	Condition	Suitability
A	Good and operating efficiently	Good. Facilities suitable for teaching, learning and wellbeing in school
B	Satisfactory but with minor deterioration	Satisfactory. Performing as intended but does not effectively support the delivery of the curriculum in some areas
C	Poor with major defects	Poor. Teaching methods inhibited/adverse impact on school organisation
D	End of Life; life has expired or risk of imminent failure	Very poor. Buildings seriously inhibit the staff’s ability to deliver the curriculum

Whitchurch High School is rated C+ for condition and B for suitability. The site, and local infrastructure off-site, would support the expansion of the base.

### Quality and Standards

The Council works closely with two organisations in order to monitor the performance of schools and to support school improvement.

Estyn is the office of Her Majesty’s Chief Inspector of Education and Training in Wales.

Estyn inspects quality and standards in schools and other education providers in Wales.

The Central South Consortium Joint Education Service (CSCJES) is the regional School Improvement Service for the five councils of Bridgend, Cardiff, Merthyr Tydfil, Rhondda Cynon Taff and the Vale of Glamorgan. The Council works with the Consortium to support and challenge all schools in Cardiff.

Local Authorities, such as Cardiff Council, must consider Estyn reports and other evidence about school performance and effectiveness when suggesting changes to schools.

Local Authorities must also consider the likely impact of the proposed changes on:

- standards, wellbeing and attitudes to learning
- teaching and learning experiences
- care support and guidance
- leadership and management (leadership, improving quality, partnership working and resource management)

## Estyn

Schools are inspected as part of a national programme of school inspection. The purpose of an inspection is to identify good features and shortcomings in schools in order that they may improve the quality of education offered and raise standards achieved by their pupils (Estyn).

The relevant Estyn Inspection reports provide grades against Key Questions and provide schools with recommendations for improvement.

You can find inspection reports on the Estyn website [www.estyn.gov.uk](http://www.estyn.gov.uk)

### Welsh Government categorisation of schools

In 2014, the Welsh Government introduced a new categorisation system.

It looks at each school's standards and how much a school is able to improve. This identifies the level of support schools require.

Organisations such as the Central South Consortium (CSCJES) and the school improvement service then work with schools' leaders to identify, provide and/or broker any support required for further improvement.

The categorisation system is described in Table 8 below:

Table 8: Categorisation System	
Category of support	What the category means
Green	A highly effective school which is well run, has a strong leadership and is clear about its priorities for improvement
Yellow	An effective school which is already doing well and knows the areas it needs to improve.
Amber	A school in need of improvement which needs help to identify the steps to improve or to make change happen more quickly.
Red	A school in need of greatest improvement and will receive immediate, intensive support.

A school's colour-coded category is decided by how it is rated for standards (1-4) and for how able it is to improve (A-D).

1 is the best rating for standards and A is the best for improvement.

Updated categorisations for each school are published every year in January.

More information about the categorisation scheme can be found in the Welsh Government's parents' guide to the National School Categorisation System here:

<http://gov.wales/docs/dcells/publications/150119-parents-guide-en.pdf>

## Whitchurch High School

Whitchurch High School was last inspected by Estyn in January 2016.

At this time the school's performance and prospects for improvement were judged as adequate and needing improvement.

Following a further monitoring visit in November 2017, the school was judged to have made sufficient progress and was removed from the list of schools requiring Estyn review.

In the most recent Welsh Government School Categorisation at January 2020, Whitchurch High School was categorised at Yellow (An effective school which is already doing well and knows the areas it needs to improve).

An assessment provided by the Central South Consortium in Autumn 2021 gave the following evaluation:

- The proportion of pupils making two or more levels of progress from Key Stage 2 (age 7 – 11) to Key Stage 3 (age 11 – 14), in comparison with local and regional averages, was greater for mathematics and science and was in line for English.
- The overall progress made by the school since the core inspection of January 2016 is strong. This progress has resulted from the successful and sustained ability to plan and implement change by school leaders and governors.

## How would standards at the school be affected by the changes

### Standards

The Council has made a clear commitment to continuing the investment in, and improvement of, Cardiff schools to make sure every child has the best possible start in life ([www.cardiffcommitment.co.uk](http://www.cardiffcommitment.co.uk)).

The Council works closely with the governing bodies of schools to make sure that standards in schools are high, that teaching is good, and that leadership and governance is strong.

Standards at Whitchurch High School are good. Increasing the Specialist Resource Base provision would provide appropriate high quality school places for young people with complex learning needs. It is not expected that the proposal will impact on standards at the school.

The proposal is not expected to have any negative impact on the quality of standards of education at the school as a result of the proposed changes.

### Teaching and learning experiences

The proposal is not expected to have any negative impact on teaching and learning experiences at Whitchurch High School.

## Care support and guidance

All schools have an appropriate range of policies and provision in place to promote pupils' health and wellbeing.

The school is committed to providing an environment in which learning is valued and pupils achieve their potential in a happy, safe environment in which they show respect and tolerance for each other.

The Council would work with the leadership of the school to make sure everyone understands their responsibility for helping to improve and sustain care support and guidance.

## Leadership and Management

The Council would continue to work with the leadership of the school to make sure everyone understands their responsibility for helping to improve and sustain high performance. It would support the school to have a good relationship with parents and other partners so that pupils receive a high-quality education.

The proposed changes would be planned carefully so that the school's leadership and governance is not disrupted, which could have a negative impact on educational standards.

## Additional support for pupils

Table 9 below show the percentages of:

- Pupils with Additional Learning Needs
- Pupils receiving Free School Meals
- Pupils with English as an Additional Language
- Minority Ethnic pupils at at each of the schools.

**Table 9: Whitchurch High School**

All pupils	%
% of Pupils on School Action	1.1
% of Pupils on School Action Plus	3.5
% of Pupils with a statement of ALN	4.9
% of Free School Meals Pupils- 3 year average	14.8
% of Pupils with English as an Additional Language	3
% of Minority Ethnic Pupils	22.5

## Impact on pupils with Additional Learning Needs (ALN)

The current expertise at the school would be maintained. The expansion of additional learning needs provision would provide opportunities for staff development and for enhancing pupils' learning.

The Council acknowledges that a change in environment can be unsettling and upsetting for children with additional learning needs. Pupils would be supported to enable them to adapt to the changes proposed.

## How would support for pupils with English as an Additional Language be affected?

Pupils that receive support because they have English as an additional language can be supported in any school in Cardiff.

There is no information available that suggests that the proposal would have a negative effect on how children with English as an additional language are supported. The school would continue to provide support that is appropriate to the individual needs of each pupil.

## How would pupils receiving Free School Meals be affected?

Some of the funding that a school receives is based on the number of pupils in the school who receive Free School Meals. All schools in Cardiff would receive funding for these pupils.

There is no information available that suggests that the proposal would have a negative effect on pupils at the school who receive Free School Meals.

## How would Minority Ethnic Pupils be affected?

The needs of individual pupils are assessed and provided for as appropriate. There is also no information available that suggests that the proposal would have a negative effect on provision for any ethnic group.



## What are the benefits of the proposed change?

- The proposal would increase the number of Specialist Resource Base places for secondary aged learners with complex learning needs and would contribute towards meeting projected demand.
- The opportunity to employ additional specialist staff and to work more closely with specialist services in Cardiff would enhance the school's inclusive teaching. This would benefit all pupils in the school.
- The proposal would ensure that pupils living in the northern areas of the city travel shorter distances to access specialist provision than to alternative provision.

## Potential disadvantages of the proposed change

- Some pupils with additional learning needs can find change difficult. They may find changes to buildings unsettling. We know they will need carefully planned support to adapt to the changes. However, there would be sufficient time to plan and support such changes.
- There is potential for a small increase in traffic around the school site at the start and end of the day. The Council would work with the Governing Body of the school to develop a Travel Plan to minimise any potential disruption.

## Alternative options considered

The Council is seeking to provide a better distribution of specialist resource base provision across the city. This would improve access for pupils, and reduce travel times for many pupils, as well as increasing the number of places available. A number of other expansions, and new provision at other schools city-wide, are also proposed.

Alternative options to the expansion of the Whitchurch High School Specialist Resource Base could include:

- the expansion of similar provision on other secondary school sites
- the establishment of new specialist provision on other school sites and/or a different number of places in the current or proposed bases.

However, the standards at Whitchurch High School are good. Increasing the Specialist Resource Base provision provides an increased number of appropriate high quality school places. The expansion of the successful base at Whitchurch High School to 100 places is therefore considered to be a preferred option.

## Human Resources Matters

HR People Services will work with the Governing Body to address the HR implications arising from the increase in the designated number of the Specialist Resource Base at the school and the resulting need for additional staffing.

Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the increase in the designated number of the Specialist Resource Base will provide opportunities for school-based staff on the school redeployment register.

## Transport matters

The Council applies the two-mile statutory qualifying walking distance criteria for pupils to qualify for free home to school transport to specialist resource bases. Some specialist resource base learners who live within two miles of the school may be provided with free transport due to their individual learning needs and social issues. Other learners are able to travel independently or with parent/carers and if resident within the two-mile qualifying distance may not be eligible for Learner Transport. These pupils as well as staff and school visitors would benefit from any required improvements in facilities for active travel to school or public transport facilities.

As the Council is seeking to provide a better distribution of specialist resource provision across the city, it is expected that the average travel distance to specialist resource bases for individual learners would reduce in future.

A school proposal to establish Additional Learning Needs facilities may require a Transport Statement which will identify measures to be included as part of the application to maximise travel by sustainable modes.

The Council's current Corporate Plan includes a commitment to every school in Cardiff developing an Active Travel Plan. Such a plan will identify actions by the school to support and encourage active travel to school and also any improvements to on-site and off-site infrastructure required to facilitate active journeys.

Increasing travel to school by active modes (walking, cycling and scooting) by ensuring safe facilities are provided will have a positive impact on children's health and wellbeing.

A number of initiatives have successfully demonstrated support and encouragement for active and sustainable travel amongst the Additional Learning Needs cohort, which would be offered to learners as appropriate, including Independent Travel Training for older pupils (to be reviewed each year), cycle maintenance and cycle training.

With the expected increased demand for Learner Transport suitable improved and / or expanded facilities for drop-off and pick-up may be required within the site to accommodate the appropriate numbers of vehicles. Other improvements may include modifications to the layout, signing and traffic control measures.

## Have your say

At the end of the booklet is a questionnaire. This is your chance to let the Council know what you think about the proposal. You can give a response to all of the questions, or just respond to some of them, as you prefer.

Alternatively, you can send us your views in one of the following ways:

- Completing the online response form at [www.cardiff.gov.uk/ALNSchoolproposals](http://www.cardiff.gov.uk/ALNSchoolproposals)
- Email your views to [schoolresponses@cardiff.gov.uk](mailto:schoolresponses@cardiff.gov.uk)
- Write to us at the following address: School Organisation Planning, Room 401, County Hall, Atlantic Wharf, Cardiff, CF10 4UW.

The Council will consider everyone's views before deciding whether to go ahead with the proposed changes.

**The closing date for responses to this proposal is 1 February 2022.**

## Proposal for the establishment of a Specialist Resource Base at Willows High School

## Proposal for the establishment of a Specialist Resource Base at Willows High School

Willows High School is an English-medium community high school for pupils aged 11 – 16.

The school is located at Willows Avenue, Tremorfa. Plans to transfer the school to new build accommodation at Lewis Road are currently being progressed. The new Willows High School will have a modern design and new facilities including state-of-the-art educational amenities in a brand-new building.

To meet the demand for secondary Specialist Resource Base places for learners with complex learning needs it is proposed to:

- establish a 30 place Specialist Resource Base at Willows High School from September 2023.

It is proposed that the new base would initially be accommodated within the existing buildings, with the necessary adaptations undertaken. Specialist accommodation would then be provided as part of the development of the new Willows High School.

### The number of places at the school

Table 10 below provides details of places available at Willows High School

Name of school	Current Published Capacity (age 11 – 16)	Places per year group (age 11 – 16)	Sixth form places	Language medium and Category of School
Willows High School	1121	224	0	English-medium community secondary school

The current capacity of Willows High School is 1121 places and the school had 730 pupils on roll in April 2021. The school has sufficient classroom space to accommodate a greater number of pupils and has re-designated these rooms for other purposes. The school will be transferring to new build accommodation at Lewis Road from September 2025. Specialist accommodation will be provided as part of this.



### Demand for places at the school

Table 11 below sets out details of recent and projected numbers on roll

School	Numbers on Roll (PLASC)					Pupil projections*				
	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
Willows High School mainstream places	554	581	619	665	730	734	744	748	731	778
Willows High School Specialist Resource Base places	N/A	N/A	N/A	N/A	N/A	N/A	5	10	15	20

\* School pupil numbers based on local catchment population projections and historical patterns of demand

### Condition and Suitability of School Buildings

All schools in Cardiff are given a Condition rating from A (performing as intended / operating efficiently) to D (life expired / risk of imminent failure)

Schools in Cardiff are also given a Suitability rating from A (good – facilities suitable for teaching, learning & wellbeing) to D (bad – building seriously inhibit the staff's ability to deliver the curriculum).

## Quality and Standards

The Council works closely with two organisations in order to monitor the performance of schools and to support school improvement.

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Estyn inspects quality and standards in schools and other education providers in Wales.

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Local Authorities, such as Cardiff Council, must consider Estyn reports and other evidence about school performance and effectiveness when suggesting changes to schools.

Local Authorities must also consider the likely impact of the proposed changes on:

- standards, wellbeing and attitudes to learning
- teaching and learning experiences
- care support and guidance
- leadership and management (leadership, improving quality, partnership working and resource management)

Grading	Condition	Suitability
A	Good and operating efficiently	Good. Facilities suitable for teaching, learning and wellbeing in school
B	Satisfactory but with minor deterioration	Satisfactory. Performing as intended but does not effectively support the delivery of the curriculum in some areas
C	Poor with major defects	Poor. Teaching methods inhibited/adverse impact on school organisation
D	End of Life; life has expired or risk of imminent failure	Very poor. Buildings seriously inhibit the staff's ability to deliver the curriculum

The current Willows High School buildings are rated D for condition and C for suitability. However, plans to transfer the school to new build accommodation at Lewis Road are currently being progressed.

The school is transferring to new build accommodation at Lewis Road from September 2025.

## Estyn

Schools are inspected as part of a national programme of school inspection. The purpose of an inspection is to identify good features and shortcomings in schools in order that they may improve the quality of education offered and raise standards achieved by their pupils (Estyn).

The relevant Estyn Inspection reports provide grades against Key Questions and provide schools with recommendations for improvement.

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## Welsh Government categorisation of schools

In 2014, the Welsh Government introduced a new categorisation system.

It looks at each school's standards and how much a school is able to improve. This identifies the level of support schools require. Organisations such as the Central South Consortium (CSCJES) and the school improvement service then work with schools' leaders to identify, provide and/or broker any support required for further improvement.

The categorisation system is described in Table 13 below:

Category of support	What the category means
<b>Green</b>	A highly effective school which is well run, has a strong leadership and is clear about its priorities for improvement
<b>Yellow</b>	An effective school which is already doing well and knows the areas it needs to improve.
<b>Amber</b>	A school in need of improvement which needs help to identify the steps to improve or to make change happen more quickly.
<b>Red</b>	A school in need of greatest improvement and will receive immediate, intensive support.

A school's colour-coded category is decided by how it is rated for standards (1-4) and for how able it is to improve (A-D).

1 is the best rating for standards and A is the best for improvement.

Updated categorisations for each school are published every year in January.

More information about the categorisation scheme can be found in the Welsh Government's parents' guide to the National School Categorisation System here:

<http://gov.wales/docs/dcells/publications/150119-parents-guide-en.pdf>

## Willows High School

Willows High School was last inspected by Estyn in April 2018.

At this time the standards, wellbeing and attitudes to learning, teaching and learning experience, and leadership and management were judged as adequate and needing improvement. The schools care, support and guidance was judged as good.

In the most recent Welsh Government School Categorisation at January 2020, Willows High School was categorised at Yellow (An effective school which is already doing well and knows the areas it needs to improve).

An assessment provided by the Central South Consortium in Autumn 2021 gave the following evaluation:

- The proportion of pupils making two or more levels of progress from Key Stage 2 (ages 7 – 11) to Key Stage 3 (ages 11-14), in comparison with local and regional averages, was much greater in English, though was much lower in mathematics and science.
- The school has made strong progress in supporting most teachers to develop consistent strategies to improve the learning experiences of most pupils.

## How would standards at the school be affected by the changes

### Standards

The Council has made a clear commitment to continuing the investment in, and improvement of, Cardiff schools to make sure every child has the best possible start in life ([www.cardiffcommitment.co.uk](http://www.cardiffcommitment.co.uk)).

The Council works closely with the governing bodies of schools to make sure that standards in schools are high, that teaching is good and that leadership and governance is strong.

Standards at Willows High School are good. Establishing specialist resource base provision at the school would provide appropriate high quality school places for young people with complex learning needs.

The proposal is not expected to have any negative impact on the quality of standards of education at the school as a result of the proposed changes.

### Teaching and learning experiences

The proposal is not expected to have any negative impact on teaching and learning experiences at Willows High School.

### Care support and guidance

All schools have an appropriate range of policies and provision in place to promote pupils' health and wellbeing.

The school is committed to providing an environment in which learning is valued and pupils achieve their potential in a happy, safe environment in which they show respect and tolerance for each other.

The Council would work with the leadership of the school to make sure everyone understands their responsibility for helping to improve and sustain care support and guidance.

### Leadership and Management

The Council would continue to work with the leadership of the school to make sure everyone understands their responsibility for helping to improve and sustain high performance. It would support the school to have a good relationship with parents and other partners so that pupils receive a high-quality education.

The proposed changes would be planned carefully so that the school's leadership and governance is not disrupted, which could have a negative impact on educational standards.

## Additional support for pupils

Table 14 below shows the percentages of:

- Pupils with Additional Learning Needs
- Pupils receiving Free School Meals
- Pupils with English as an Additional Language
- Minority Ethnic pupils at each of the schools.

Table 14: Willows High School	
All pupils	%
% of Pupils on School Action	7.5
% of Pupils on School Action Plus	11.4
% of Pupils with a statement of ALN	1.5
% of Free School Meals Pupils- 3 year average	48.5
% of Pupils with English as an Additional Language	22.5
% of Minority Ethnic Pupils	53.6

## Impact on pupils with Additional Learning Needs (ALN)

The current expertise at the school would be maintained. The establishment of specialist resource base provision would provide opportunities for staff development and for enhancing pupils' learning in purpose-built facilities.

The Council acknowledges that a change in environment can be unsettling and upsetting for children with additional learning needs. Pupils would be supported to enable them to adapt to the changes proposed.

## How would support for pupils with English as an Additional Language be affected?

Pupils that receive support because they have English as an additional language can be supported in any school in Cardiff.

There is no information available that suggests that the proposal would have a negative effect on how children with English as an additional language are supported. The school would continue to provide support that is appropriate to the individual needs of each pupil.

## How would pupils receiving Free School Meals be affected?

Some of the funding that a school receives is based on the number of pupils in the school who receive Free School Meals. All schools in Cardiff would receive funding for these pupils.

There is no information available that suggests that the proposal would have a negative effect on pupils at the school who receive Free School Meals.

## How would Minority Ethnic Pupils be affected?

The needs of individual pupils are assessed and provided for as appropriate. There is also no information available that suggests that the proposal would have a negative effect on provision for any ethnic group.

## What are the benefits of the proposed change?

- The proposal would increase the number of specialist resource places for secondary aged learners with complex learning needs and would contribute towards meeting projected demand.
- The opportunity to employ specialist staff and to work more closely with specialist services in Cardiff would enhance the school's inclusive teaching. This would benefit all pupils in the school.
- The proposal would ensure that pupils living in the southern area of the city travel shorter distances to access specialist provision than to alternative provision.

## Potential disadvantages of the proposed change

- Some pupils with additional learning needs can find change difficult. They may find moving to a new building on a new site unsettling. We know they will need carefully planned support to adapt to the new setting. However, there would be sufficient time to plan and support such a transition.
- There is potential for a small increase in traffic around the school site at the start and end of the day. The Council would work with the Governing Body of the school to develop a Travel Plan to minimise any potential disruption.

## Alternative options considered

The Council is seeking to provide a better distribution of specialist resource provision across the city. This would improve access for pupils, and reduce travel times for many pupils, as well as increasing the number of places available. A number of other expansions, and new provision at other schools city-wide, are also proposed.

Alternative options to the establishment of a Specialist Resource Base at Willows High School could include:

- the establishment of new specialist provision on other school sites and/or
- the expansion of existing provision on other secondary school sites, and/ or a different number of places in the current or proposed bases.

There is no Specialist Resource Base provision in the area served by Willows High School at present. All children in this area who require placement in a specialist resource base currently travel to other areas. The nearest Specialist Resource Base for learners aged 11-16 with complex learning needs is at Whitchurch High School, approximately six miles from Willows High School. Establishing provision elsewhere, or expanding existing provision, would not improve access for children living in the area served by Willows High School.

The establishment of the Specialist Resource Base could be delayed until the new Willows High School building is complete. However, this would mean that children requiring the support of a resource base would need to take up a place elsewhere, and additional places may need to be provided in new accommodation at significant cost for an extended temporary period.

Establishing this provision at Willows High School ahead of transferring to new build accommodation is therefore considered to be the preferred option.

## Human Resources Matters

HR People Services will work with the Governing Body to address the HR implications arising from the establishment of a Specialist Resource Base at the school and the resulting need for additional staffing.

Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the establishment of the Specialist Resource Base will provide opportunities for school-based staff on the school redeployment register.

## Transport matters

The Council applies the two-mile statutory qualifying walking distance criteria for pupils to qualify for free home to school transport to specialist resource bases. However, some learners who live within two miles of the school may be provided with free transport due to their individual learning needs and social issues.

Other learners are able to travel independently or with parent/carers and if resident within the two-mile qualifying distance may not be eligible for Learner Transport. These pupils as well as staff and school visitors would benefit from any required improvements in facilities for active travel to school or public transport facilities.

As this is a proposal for a new school which is also to establish new Additional Learning Needs facilities, it will require a Transport Assessment which will identify measures to be included as part of the application to maximise travel by sustainable modes.

The Council's current Corporate Plan includes a commitment to every school in Cardiff developing an Active Travel Plan. Such a plan will identify actions by the school to support and encourage active travel to school and also any improvements to on-site and off-site infrastructure required to facilitate active journeys.

Increasing travel to school by active modes (walking, cycling and scooting) by ensuring safe facilities are provided will have a positive impact on children's health and wellbeing.

A number of initiatives have successfully demonstrated support and encouragement for active and sustainable travel amongst the Additional Learning Needs cohort, which would be offered to learners as appropriate, including Independent Travel Training for older pupils, cycle maintenance and cycle training.

Suitable facilities for drop-off and pick-up by Learner Transport vehicles will be incorporated within the design of the new school site to accommodate the appropriate numbers of vehicles with a designated access.

## Have your say

At the end of the booklet is a questionnaire. This is your chance to let the Council know what you think about the proposal. You can give a response to all of the questions, or just respond to some of them, as you prefer.

Alternatively, you can send us your views in one of the following ways:

- Completing the online response form at [www.cardiff.gov.uk/ALNSchoolproposals](http://www.cardiff.gov.uk/ALNSchoolproposals)
- Email your views to [schoolresponses@cardiff.gov.uk](mailto:schoolresponses@cardiff.gov.uk)
- Write to us at the following address: School Organisation Planning, Room 401, County Hall, Atlantic Wharf, Cardiff, CF10 4UW.

The Council will consider everyone's views before deciding whether to go ahead with the proposed changes.

**The closing date for responses to this proposal is 1 February 2022.**

## Proposal for Additional Specialist Resource Base places at Llanishen High School

### Proposal for Additional Specialist Resource Base places at Llanishen High School

Llanishen High School is an English-medium community high school for pupils aged 11-19. The school is located at Heol Hir in Llanishen.

The school hosts a Specialist Resource Base designated for Autism Spectrum Condition and a Specialist Resource Base for learners with a hearing impairment.

No changes are proposed to the school's Specialist Resource Base for learners with a hearing impairment.

To meet the demand for Specialist Resource Base places for learners with Autism Spectrum Condition aged 11 - 19 it is proposed to:

- increase the designated number at the Llanishen High School Specialist Resource Base from 20 to 45 from September 2022

Interim works have been undertaken and further works would be necessary to improve and extend the current Specialist Resource Base facilities and accommodation. Some of this work has already been undertaken in order that the school, and the Council, can ensure sufficient places were available for children requiring the support of the base.

#### The number of places at the school

Table 15 below provides details of places available at Llanishen High School

Name of school	Current Published Capacity (age 11 – 16)	Places per year group (age 11 – 16)	Sixth form places	Language medium and Category of School
Llanishen High School (Non-ASC places)	1500	300	300	English-medium community primary school
Llanishen High School (ASC Specialist Resource Base places)		20		





The current capacity of Llanishen High School is 1800 places and the school had 1632 pupils on roll in April 2021 including pupils in the Specialist Resource Base.

The current capacity of the Specialist Resource Base for learners with Autistic Spectrum Condition at Llanishen High School is 20 places however the base had 45 learners on roll in October 2021.

### Demand for places at the school

Table 16 below sets out details of recent and projected numbers on roll

Table 16: Recent and projected numbers on roll at Llanishen High School										
School	Numbers on Roll (PLASC)					Pupil projections*				
	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
Llanishen High School mainstream places	1517	1530	1536	1568	1587	1608	1631	1640	1631	1607
Llanishen High School Specialist Resource Base Places (ASC)	25	27	27	33	45	45	45	45	45	45

\* School pupil numbers based on local catchment population projections and historical patterns of demand

### Condition and Suitability of School Buildings

All schools in Cardiff are given a Condition rating from A (performing as intended / operating efficiently) to D (life expired / risk of imminent failure)

Schools in Cardiff are also given a Suitability rating from A (good – facilities suitable for teaching, learning & wellbeing) to D (bad – building seriously inhibit the staff’s ability to deliver the curriculum).

Table 17: Condition and suitability gradings

Grading	Condition	Suitability
A	Good and operating efficiently	Good. Facilities suitable for teaching, learning and wellbeing in school
B	Satisfactory but with minor deterioration	Satisfactory. Performing as intended but does not effectively support the delivery of the curriculum in some areas
C	Poor with major defects	Poor. Teaching methods inhibited/adverse impact on school organisation
D	End of Life; life has expired or risk of imminent failure	Very poor. Buildings seriously inhibit the staff’s ability to deliver the curriculum

Llanishen High School is rated C for condition and C for suitability.

The site, and local infrastructure off-site, would support the expansion of the base.

### Quality and Standards

The Council works closely with two organisations in order to monitor the performance of schools and to support school improvement.

Estyn is the office of Her Majesty’s Chief Inspector of Education and Training in Wales.

Estyn inspects quality and standards in schools and other education providers in Wales.

The Central South Consortium Joint Education Service (CSCJES) is the regional School Improvement Service for the five councils of Bridgend, Cardiff, Merthyr Tydfil, Rhondda Cynon Taff and the Vale of Glamorgan. The Council works with the Consortium to support and challenge all schools in Cardiff.

Local Authorities, such as Cardiff Council, must consider Estyn reports and other evidence about school performance and effectiveness when suggesting changes to schools.

Local Authorities must also consider the likely impact of the proposed changes on:

- standards, wellbeing and attitudes to learning
- teaching and learning experiences
- care support and guidance
- leadership and management (leadership, improving quality, partnership working and resource management)

## Estyn

Schools are inspected as part of a national programme of school inspection. The purpose of an inspection is to identify good features and shortcomings in schools in order that they may improve the quality of education offered and raise standards achieved by their pupils (Estyn).

The relevant Estyn Inspection reports provide grades against Key Questions and provide schools with recommendations for improvement.

You can find inspection reports on the Estyn website [www.estyn.gov.uk](http://www.estyn.gov.uk)

## Welsh Government categorisation of schools

In 2014, the Welsh Government introduced a new categorisation system.

It looks at each school's standards and how much a school is able to improve. This identifies the level of support schools require. Organisations such as the Central South Consortium (CSCJES) and the school improvement service then work with schools' leaders to identify, provide and/or broker any support required for further improvement.

The categorisation system is described in Table 18 below:

Table 18: Categorisation System	
Category of support	What the category means
<b>Green</b>	A highly effective school which is well run, has a strong leadership and is clear about its priorities for improvement
<b>Yellow</b>	An effective school which is already doing well and knows the areas it needs to improve.
<b>Amber</b>	A school in need of improvement which needs help to identify the steps to improve or to make change happen more quickly.
<b>Red</b>	A school in need of greatest improvement and will receive immediate, intensive support.

A school's colour-coded category is decided by how it is rated for standards (1-4) and for how able it is to improve (A-D).

1 is the best rating for standards and A is the best for improvement.

Updated categorisations for each school are published every year in January.

More information about the categorisation scheme can be found in the Welsh Government's parents' guide to the National School Categorisation System here:

<http://gov.wales/docs/dcells/publications/150119-parents-guide-en.pdf>

## Llanishen High School

Llanishen High School was last inspected by Estyn in February 2016.

At this time the school's performance and prospects for improvement were judged as adequate and needing improvement.

Following a further monitoring visit in November 2016, the school was judged to have made good progress and was removed from the school from the list of schools requiring Estyn review.

In the most recent Welsh Government School Categorisation at January 2020, Llanishen High School was categorised at Green (A highly effective school which is well run, has a strong leadership and is clear about its priorities for improvement).

An assessment provided by the Central South Consortium in Autumn 2021 gave the following evaluation:

- Progress from Key Stage 2 (ages 7 – 11) to Key Stage 3 (ages 11 – 14) has continued to be very strong, with most pupils making expected progress or above in English, mathematics and science.
- The Pupil Development Grant (PDG) has been used effectively to improve outcomes for learners, an example being the performance of pupils eligible for Free School Meals across all core subjects at Key Stage 4 (ages 14 – 16).
- The school is very well led and managed by the headteacher and the senior leadership team. They have worked very effectively to raise the achievement of nearly all pupils and improve teaching and are well supported by the main body of staff who are keen for the school to improve further.

## How would standards at the school be affected by the changes

### Standards

The Council has made a clear commitment to continuing the investment in, and improvement of, Cardiff schools to make sure every child has the best possible start in life ([www.cardiffcommitment.co.uk](http://www.cardiffcommitment.co.uk)).

The Council works closely with the governing bodies of schools to make sure that standards in schools are high, that teaching is good and that leadership and governance is strong.

Standards at Llanishen High School are good. Increasing the Autism Spectrum Condition Specialist Resource Base provision would provide appropriate high quality school places for young people with autism. It is not expected that the proposal will impact on standards at the school.

The proposal is not expected to have any negative impact on the quality of standards of education at the school as a result of the proposed changes.

### Teaching and learning experiences

The proposal is not expected to have any negative impact on teaching and learning experiences at Llanishen High School.

### Care support and guidance

All schools have an appropriate range of policies and provision in place to promote pupils' health and wellbeing.

The school is committed to providing an environment in which learning is valued and pupils achieve their potential in a happy, safe environment in which they show respect and tolerance for each other.

The Council would work with the leadership of the school to make sure everyone understands their responsibility for helping to improve and sustain care support and guidance.

### Leadership and Management

The Council would continue to work with the leadership of the school to make sure everyone understands their responsibility for helping to improve and sustain high performance. It would support the school to have a good relationship with parents and other partners so that pupils receive a high-quality education.

The proposed changes would be planned carefully so that the school's leadership and governance is not disrupted, which could have a negative impact on educational standards.

## Additional support for pupils

Table 19 below shows the percentages of:

- Pupils with Additional Learning Needs
- Pupils receiving Free School Meals
- Pupils with English as an Additional Language
- Minority Ethnic pupils at each of the schools.

Table 19: Llanishen High School	
All pupils	%
% of Pupils on School Action	7.1
% of Pupils on School Action Plus	3.4
% of Pupils with a statement of ALN	5.3
% of Free School Meals Pupils- 3 year average	21.9
% of Pupils with English as an Additional Language	3.8
% of Minority Ethnic Pupils	24.7

### Impact on pupils with Additional Learning Needs (ALN)

The current expertise at the school would be maintained. The expansion of additional learning needs provision would provide opportunities for staff development and for enhancing pupils' learning.

The Council acknowledges that a change in environment can be unsettling and upsetting for children with additional learning needs. Pupils would be supported to enable them to adapt to the changes proposed.

### How would support for pupils with English as an Additional Language be affected?

Pupils that receive support because they have English as an additional language can be supported in any school in Cardiff.

There is no information available that suggests that the proposal would have a negative effect on how children with English as an additional language are supported. The school would continue to provide support that is appropriate to the individual needs of each pupil.

### How would pupils receiving Free School Meals be affected?

Some of the funding that a school receives is based on the number of pupils in the school who receive Free School Meals. All schools in Cardiff would receive funding for these pupils.

There is no information available that suggests that the proposal would have a negative effect on pupils at the school who receive Free School Meals.

### How would Minority Ethnic Pupils be affected?

The needs of individual pupils are assessed and provided for as appropriate. There is also no information available that suggests that the proposal would have a negative effect on provision for any ethnic group.

### What are the benefits of the proposed change?

- The proposal would increase the number of Specialist Resource Base places for secondary aged learners with autism spectrum condition and would contribute towards meeting projected demand.
- The opportunity to employ additional specialist staff and to work more closely with specialist services in Cardiff would enhance the school's inclusive teaching. This would benefit all pupils in the school.
- The proposal would ensure that pupils living in the north of the city travel shorter distances to access specialist provision than to alternative provision.

### Potential disadvantages of the proposed change

- Some pupils with additional learning needs can find change difficult. They may find changes to buildings unsettling. We know they will need carefully planned support to adapt to the changes. However, there would be sufficient time to plan and support such a change.
- There is potential for a small increase in traffic around the school site at the start and end of the day. The Council would work with the Governing Body of the school to develop a Travel Plan to minimise any potential disruption.

### Alternative options considered

The Council is seeking to provide a better distribution of specialist resource provision across the city. This would improve access for pupils, and reduce travel times for many pupils, as well as increasing the number of places available. A number of other expansions, and new provision at other schools city-wide, are also proposed.

Alternative options to the expansion of the Llanishen High School Specialist Resource Base could include:

- the expansion of similar provision on other secondary school sites
- the establishment of new specialist provision on other school sites and/or a different number of places in the current or proposed bases.

However, the standards at Llanishen High School are good. Increasing the Specialist Resource Base provision provides an increased number of appropriate high quality school places. The permanent expansion of the successful base at Llanishen High School to 45 places is therefore considered to be a preferred option.

### Human Resources Matters

HR People Services will work with the Governing Body to address the HR implications arising from the increase in the designated number of the Autism Spectrum Condition Specialist Resource Base at the school and the resulting need for additional staffing.

Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the increase in the designated number of the Autism Spectrum Condition Specialist Resource Base will provide opportunities for school-based staff on the school redeployment.

### Transport matters

The Council applies the two-mile statutory qualifying walking distance criteria for pupils to qualify for free home to school transport to specialist resource bases. Some specialist resource base learners who live within two miles of the school may be provided with free transport due to their individual learning needs and social issues.

Other learners are able to travel independently or with parent/carers and if resident within the two-mile qualifying distance may not be eligible for Learner Transport. These pupils as well as staff and school visitors would benefit from any required improvements in facilities for active travel to school or public transport facilities.

As the Council is seeking to provide a better distribution of specialist resource provision across the city, it is expected that the average travel distance to specialist resource bases for individual learners would reduce in future.

A school proposal to establish Additional Learning Needs facilities may require a Transport Statement which will identify measures to be included as part of the application to maximise travel by sustainable modes.

The Council's current Corporate Plan includes a commitment to every school in Cardiff developing an Active Travel Plan. Such a plan will identify actions by the school to support and encourage active travel to school and also any improvements to on-site and off-site infrastructure required to facilitate active journeys.

Increasing travel to school by active modes (walking, cycling and scooting) by ensuring safe facilities are provided will have a positive impact on children's health and wellbeing.

A number of initiatives have successfully demonstrated support and encouragement for active and sustainable travel amongst the Additional Learning Needs cohort, which would be offered to learners as appropriate, including Independent Travel Training for older pupils (to be reviewed each year), cycle maintenance and cycle training.

With the expected increased demand for Learner Transport the site would be reviewed to ensure suitable and sufficient facilities for drop-off and pick-up are provided within the site to accommodate the appropriate numbers of vehicles and improvements made if necessary. Modifications may be required to the school access.

## Have your say

At the end of the booklet is a questionnaire. This is your chance to let the Council know what you think about the proposal. You can give a response to all of the questions, or just respond to some of them, as you prefer.

Alternatively, you can send us your views in one of the following ways:

- Completing the online response form at [www.cardiff.gov.uk/ALNschoollproposals](http://www.cardiff.gov.uk/ALNschoollproposals)
- Email your views to [schoolresponses@cardiff.gov.uk](mailto:schoolresponses@cardiff.gov.uk)
- Write to us at the following address: School Organisation Planning, Room 401, County Hall, Atlantic Wharf, Cardiff, CF10 4UW.

The Council will consider everyone's views before deciding whether to go ahead with the proposed changes.

**The closing date for responses to this proposal is 1 February 2022.**

## Proposal for Additional Specialist Resource Base places at The Marion Centre, The Bishop of Llandaff Church in Wales High School

## Proposal for Additional Specialist Resource Base places at The Marion Centre, The Bishop of Llandaff Church in Wales High School

The Bishop of Llandaff Church in Wales High School is an English-medium voluntary aided secondary school for pupils aged 11-18. The school is located at Rookwood Close in Llandaff.

The school hosts a Specialist Resource Base, The Marion Centre, designated for pupils with Autism Spectrum Condition.

To meet the demand for Specialist Resource Base places for learners with Autism Spectrum Condition aged 11 – 19 it is proposed to:

- increase the designated number at The Marion Centre Specialist Resource Base from 42 to 66 from September 2022

It is proposed that the current Specialist Resource Base accommodation would be improved and refurbished, creating additional classrooms and learning spaces.



The current capacity of Bishop of Llandaff Church in Wales High School is 1085 places and the school had 1231 pupils on roll in April 2021, including pupils in the Specialist Resource Base.

### Demand for places at the school

Table 21 below sets out details of recent and projected numbers on roll

Table 21: Recent and projected numbers on roll										
School	Numbers on Roll (PLASC)					Pupil projections*				
	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
Bishop of Llandaff Church in Wales High School mainstream places	1228	1252	1245	1240	1239	1257	1260	1258	1261	1260
The Marion Centre (Specialist Resource Base) places	52	49	51	51	56	65	66	66	66	66

\* School pupil numbers based on local catchment population projections and historical patterns of demand

### The number of places at the school

Table 20 below provides details of places available

Table 20: Places available at Bishop of Llandaff Church in Wales High School				
Name of school	Current Published Capacity (age 11 – 16)	Places per year group (age 11 – 16)	Sixth form places	Language medium and Category of School
Bishop of Llandaff Church in Wales High School (mainstream places)	900	180	185	English-medium community secondary school
The Marion Centre (Specialist Resource Base places)		42		

## Condition and Suitability of School Buildings

All schools in Cardiff are given a Condition rating from A (performing as intended / operating efficiently) to D (life expired / risk of imminent failure)

Schools in Cardiff are also given a Suitability rating from A (good – facilities suitable for teaching, learning & wellbeing) to D (bad – building seriously inhibit the staff’s ability to deliver the curriculum).

Table 22: Condition and suitability gradings		
Grading	Condition	Suitability
A	Good and operating efficiently	Good. Facilities suitable for teaching, learning and wellbeing in school
B	Satisfactory but with minor deterioration	Satisfactory. Performing as intended but does not effectively support the delivery of the curriculum in some areas
C	Poor with major defects	Poor. Teaching methods inhibited/adverse impact on school organisation
D	End of Life; life has expired or risk of imminent failure	Very poor. Buildings seriously inhibit the staff’s ability to deliver the curriculum

The Bishop of Llandaff Church in Wales High School is rated C for condition and C for suitability.

The Marion Centre is accommodated in specialist accommodation which is of a high standard. It is proposed that the current specialist resource base accommodation would be improved and refurbished, creating additional classrooms and learning spaces.

The site, and local infrastructure off-site, would support the expansion of The Marion Centre.

## Quality and Standards

The Council works closely with two organisations in order to monitor the performance of schools and to support school improvement.

Estyn is the office of Her Majesty’s Chief Inspector of Education and Training in Wales.

Estyn inspects quality and standards in schools and other education providers in Wales.

The Central South Consortium Joint Education Service (CSCJES) is the regional School Improvement Service for the five councils of Bridgend, Cardiff, Merthyr Tydfil, Rhondda Cynon Taff and the Vale of Glamorgan. The Council works with the Consortium to support and challenge all schools in Cardiff.

Local Authorities, such as Cardiff Council, must consider Estyn reports and other evidence about school performance and effectiveness when suggesting changes to schools.

Local Authorities must also consider the likely impact of the proposed changes on:

- standards, wellbeing and attitudes to learning
- teaching and learning experiences
- care support and guidance
- leadership and management (leadership, improving quality, partnership working and resource management)

## Estyn

Schools are inspected as part of a national programme of school inspection. The purpose of an inspection is to identify good features and shortcomings in schools in order that they may improve the quality of education offered and raise standards achieved by their pupils (Estyn).

The relevant Estyn Inspection reports provide grades against Key Questions and provide schools with recommendations for improvement.

You can find inspection reports on the Estyn website [www.estyn.gov.uk](http://www.estyn.gov.uk)

## Welsh Government categorisation of schools

In 2014, the Welsh Government introduced a new categorisation system.

It looks at each school’s standards and how much a school is able to improve. This identifies the level of support schools require. Organisations such as the Central South Consortium (CSCJES) and the school improvement service then work with schools’ leaders to identify, provide and/or broker any support required for further improvement.

The categorisation system is described in Table 23 below:

Table 23: Categorisation System	
Category of support	What the category means
<b>Green</b>	A highly effective school which is well run, has a strong leadership and is clear about its priorities for improvement
<b>Yellow</b>	An effective school which is already doing well and knows the areas it needs to improve.
<b>Amber</b>	A school in need of improvement which needs help to identify the steps to improve or to make change happen more quickly.
<b>Red</b>	A school in need of greatest improvement and will receive immediate, intensive support.

A school's colour-coded category is decided by how it is rated for standards (1-4) and for how able it is to improve (A-D).

1 is the best rating for standards and A is the best for improvement.

Updated categorisations for each school are published every year in January.

More information about the categorisation scheme can be found in the Welsh Government's parents' guide to the National School Categorisation System here:

<http://gov.wales/docs/dcells/publications/150119-parents-guide-en.pdf>

## The Bishop of Llandaff Church in Wales High School

The Bishop of Llandaff Church in Wales High School was last inspected by Estyn in February 2018.

At this time the standards, wellbeing and attitudes to learning, teaching and learning experience, care, support and guidance and leadership and management were all judged as excellent.

In the most recent Welsh Government School Categorisation at January 2020, Bishop of Llandaff Church in Wales High School was categorised at Green (A highly effective school which is well run, has a strong leadership and is clear about its priorities for improvement).

An assessment provided by the Central South Consortium in Autumn 2021 gave the following evaluation:

- The proportion of pupils making two or more levels of progress from Key Stage 2 (ages 7 – 11) to Key Stage 3 (ages 11 – 14), in comparison with local and regional averages, was much greater in English, mathematics and science.
- The school improvement plan (SIP) identifies key priorities clearly. It contains robust success criteria, challenging targets and clear milestones with which to measure progress.
- Processes to track pupils' progress are robust and highly effective at all levels, including within The Marion Centre, where nearly all pupils make very strong progress over time, from their starting points.

## How would standards at the school be affected by the changes

### Standards

The Council has made a clear commitment to continuing the investment in, and improvement of, Cardiff schools to make sure every child has the best possible start in life ([www.cardiffcommitment.co.uk](http://www.cardiffcommitment.co.uk)).

The Council works closely with the governing bodies of schools to make sure that standards in schools are high, that teaching is good and that leadership and governance is strong.

Standards at The Bishop of Llandaff Church in Wales High School are good. Increasing the Specialist Resource Base provision would provide appropriate high quality school places for young people with autism. It is not expected that the proposal will impact on standards at the school.

The proposal is not expected to have any negative impact on the quality of standards of education at the school as a result of the proposed changes.

### Teaching and learning experiences

The proposal is not expected to have any negative impact on teaching and learning experiences at The Bishop of Llandaff Church in Wales High School.

### Care support and guidance

All schools have an appropriate range of policies and provision in place to promote pupils' health and wellbeing.

The school is committed to providing an environment in which learning is valued and pupils achieve their potential in a happy, safe environment in which they show respect and tolerance for each other.

The Council would work with the leadership of the school to make sure everyone understands their responsibility for helping to improve and sustain care support and guidance.

### Leadership and Management

The Council would continue to work with the leadership of the school to make sure everyone understands their responsibility for helping to improve and sustain high performance. It would support the school to have a good relationship with parents and other partners so that pupils receive a high-quality education.

The proposed changes would be planned carefully so that the school's leadership and governance is not disrupted, which could have a negative impact on educational standards.



## Additional support for pupils

Table 24 below shows the percentages of:

- Pupils with Additional Learning Needs
- Pupils receiving Free School Meals
- Pupils with English as an Additional Language
- Minority Ethnic pupils at each of the schools.

**Table 24: Bishop of Llandaff Church in Wales High School**

All pupils	%
% of Pupils on School Action	7.8
% of Pupils on School Action Plus	0.8
% of Pupils with a statement of ALN	7.1
% of Free School Meals Pupils- 3 year average	8.6
% of Pupils with English as an Additional Language	3.3
% of Minority Ethnic Pupils	27.2

### Impact on pupils with Additional Learning Needs (ALN)

The current expertise at the school would be maintained. The expansion of additional learning needs provision would provide opportunities for staff development and for enhancing pupils' learning in purpose-built facilities.

The Council acknowledges that a change in environment can be unsettling and upsetting for children with additional learning needs. Pupils would be supported to enable them to adapt to the changes proposed.

### How would support for pupils with English as an Additional Language be affected?

Pupils that receive support because they have English as an additional language can be supported in any school in Cardiff.

There is no information available that suggests that the proposal would have a negative effect on how children with English as an additional language are supported. The school would continue to provide support that is appropriate to the individual needs of each pupil.

### How would pupils receiving Free School Meals be affected?

Some of the funding that a school receives is based on the number of pupils in the school who receive Free School Meals. All schools in Cardiff would receive funding for these pupils.

There is no information available that suggests that the proposal would have a negative effect on pupils at the school who receive Free School Meals.

### How would Minority Ethnic Pupils be affected?

The needs of individual pupils are assessed and provided for as appropriate. There is also no information available that suggests that the proposal would have a negative effect on provision for any ethnic group.

## What are the benefits of the proposed change?

- The proposal would increase the number of Specialist Resource Base places for secondary aged learners with Autism Spectrum Condition and would contribute towards meeting projected demand.
- The opportunity to employ specialist staff and to work more closely with specialist services in Cardiff would enhance the school's inclusive teaching. This would benefit all pupils in the school.
- The proposal would ensure that pupils living in the west of the city travel shorter distances to access specialist provision than to alternative provision.

## Potential disadvantages of the proposed change

- Some pupils with additional learning needs can find change difficult. They may find changes to buildings unsettling. We know they will need carefully planned support to adapt to the changes. However, there would be sufficient time to plan and support such a change.
- There is potential for a small increase in traffic around the school site at the start and end of the day. The Council would work with the Governing Body of the school to develop a Travel Plan to minimise any potential disruption.

## Alternative options considered

The Council is seeking to provide a better distribution of specialist resource provision across the city. This would improve access for pupils, and reduce travel times for many pupils, as well as increasing the number of places available. A number of other expansions, and new provision at other schools city-wide, are also proposed.

Alternative options to the expansion of The Marion Centre Specialist Resource Base could include:

- the expansion of similar provision on other secondary school sites
- the establishment of new specialist provision on other school sites and/or a different number of places in the current or proposed bases

However, the standards at The Bishop of Llandaff Church in Wales High School are good. Increasing the Specialist Resource Base provision provides an increased number of appropriate high quality school places. The expansion of the successful base at The Marion Centre to 66 places is therefore considered to be a preferred option.

## Human Resources Matters

HR People Services will work with the Governing Body to address the HR implications arising from the increase in the designated number of the Autism Spectrum Condition Specialist Resource Base at the school and the resulting need for additional staffing.

Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the establishment of the Specialist Resource Base will provide opportunities for school-based staff on the school redeployment register.

## Transport matters

The Council applies the two-mile statutory qualifying walking distance criteria for pupils to qualify for free home to school transport to specialist resource bases. Some specialist resource base learners who live within two miles of the school may be provided with free transport due to their individual learning needs and social issues. Other learners are able to travel independently or with parent/carers and if resident within the two-mile qualifying distance may not be eligible for Learner Transport. These pupils as well as staff and school visitors would benefit from any required improvements in facilities for active travel to school or public transport facilities.

As the Council is seeking to provide a better distribution of specialist resource provision across the city, it is expected that the average travel distance to specialist resource bases for individual learners would reduce in future.

A school proposal to establish Additional Learning Needs facilities may require a Transport Statement which will identify measures to be included as part of the application to maximise travel by sustainable modes.

The Council's current Corporate Plan includes a commitment to every school in Cardiff developing an Active Travel Plan. Such a plan will identify actions by the school to support and encourage active travel to school and also any improvements to on-site and off-site infrastructure required to facilitate active journeys.

Increasing travel to school by active modes (walking, cycling and scooting) by ensuring safe facilities are provided will have a positive impact on children's health and wellbeing.

A number of initiatives have successfully demonstrated support and encouragement for active and sustainable travel amongst the Additional Learning Needs cohort, which would be offered to learners as appropriate, including Independent Travel Training for older pupils (to be reviewed each year), cycle maintenance and cycle training.

With the expected increased demand for Learner Transport suitable improved and / or expanded facilities for drop-off and pick-up may be required within the site to accommodate the appropriate numbers of vehicles. Other improvements may include modifications to the layout including widening the internal access road and providing traffic calming.

## Have your say

At the end of the booklet is a questionnaire. This is your chance to let the Council know what you think about the proposal. You can give a response to all of the questions, or just respond to some of them, as you prefer.

Alternatively, you can send us your views in one of the following ways:

- Completing the online response form at [www.cardiff.gov.uk/ALNSchoolproposals](http://www.cardiff.gov.uk/ALNSchoolproposals)
- Email your views to [schoolresponses@cardiff.gov.uk](mailto:schoolresponses@cardiff.gov.uk)
- Write to us at the following address: School Organisation Planning, Room 401, County Hall, Atlantic Wharf, Cardiff, CF10 4UW.

The Council will consider everyone's views before deciding whether to go ahead with the proposed changes.

**The closing date for responses to this proposal is 1 February 2022.**

## Proposal for the establishment of a Specialist Resource Base at Ysgol Gyfun Gymraeg Glantaf

### Proposal for the establishment of a Specialist Resource Base at Ysgol Gyfun Gymraeg Glantaf

Ysgol Gyfun Gymraeg Glantaf is a Welsh-medium community high school located at Bridge Road in Llandaff North for pupils aged 11-18.

The school hosts a Specialist Resource Base designated for complex learning needs.

To meet demand for Specialist Resource Base places for learners with Autism Spectrum Condition aged 11 – 19 in the Welsh-medium sector it is proposed to:

- establish a 30 place Specialist Resource Base for learners with Autism Spectrum Condition at Ysgol Gyfun Gymraeg Glantaf alongside the existing 30 place Specialist Resource Base for learners with Complex Learning Needs from September 2023

It is proposed that new accommodation would be developed on site to provide purpose-built facilities for both resource bases.

No changes are proposed to the school's Specialist Resource Base for learners with complex learning needs.

#### The number of places at the school

Table 25 below provides details of places available at Ysgol Gyfun Gymraeg Glantaf

Name of school	Current Published Capacity (age 11 – 16)	Places per year group (age 11 – 16)	Sixth form places	Language medium and Category of School
Ysgol Gyfun Gymraeg Glantaf (mainstream places)	1200	240	300	Welsh-medium community secondary school
Ysgol Gyfun Gymraeg Glantaf (Specialist Resource Base places)		30		



The current capacity of Ysgol Gyfun Gymraeg Glantaf 1500 places and the school had 1329 pupils on roll in April 2021, including pupils in the Specialist Resource Base.

### Demand for places at the school

Table 26 below sets out details of recent and projected numbers on roll

School	Numbers on Roll (PLASC)					Pupil projections*				
	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
Ysgol Gyfun Gymraeg Glantaf mainstream places	1121	1154	1195	1257	1308	1373	1404	1433	1427	1431
Ysgol Gyfun Gymraeg Glantaf specialist resource base places	11	12	14	15	21	19	21	23	25	27

\* School pupil numbers based on local catchment population projections and historical patterns of demand

### Condition and Suitability of School Buildings

All schools in Cardiff are given a Condition rating from A (performing as intended / operating efficiently) to D (life expired / risk of imminent failure)

Schools in Cardiff are also given a Suitability rating from A (good – facilities suitable for teaching, learning & wellbeing) to D (bad – building seriously inhibit the staff’s ability to deliver the curriculum).

Table 27: Condition and suitability gradings

Grading	Condition	Suitability
A	Good and operating efficiently	Good. Facilities suitable for teaching, learning and wellbeing in school
B	Satisfactory but with minor deterioration	Satisfactory. Performing as intended but does not effectively support the delivery of the curriculum in some areas
C	Poor with major defects	Poor. Teaching methods inhibited/adverse impact on school organisation
D	End of Life; life has expired or risk of imminent failure	Very poor. Buildings seriously inhibit the staff’s ability to deliver the curriculum

Ysgol Gyfun Gymraeg Glantaf is rated C for condition and B for suitability.

The site, and local infrastructure off-site, would support the establishment of an additional specialist resource base. New accommodation would benefit learners with Autism Spectrum Condition attending the new base and would also benefit those attending the base for learners with Complex Learning Needs.

### Quality and Standards

The Council works closely with two organisations in order to monitor the performance of schools and to support school improvement.

Estyn is the office of Her Majesty’s Chief Inspector of Education and Training in Wales.

Estyn inspects quality and standards in schools and other education providers in Wales.

The Central South Consortium Joint Education Service (CSCJES) is the regional School Improvement Service for the five councils of Bridgend, Cardiff, Merthyr Tydfil, Rhondda Cynon Taff and the Vale of Glamorgan. The Council works with the Consortium to support and challenge all schools in Cardiff.

Local Authorities, such as Cardiff Council, must consider Estyn reports and other evidence about school performance and effectiveness when suggesting changes to schools.

Local Authorities must also consider the likely impact of the proposed changes on:

- standards, wellbeing and attitudes to learning
- teaching and learning experiences
- care support and guidance
- leadership and management (leadership, improving quality, partnership working and resource management)

## Estyn

Schools are inspected as part of a national programme of school inspection. The purpose of an inspection is to identify good features and shortcomings in schools in order that they may improve the quality of education offered and raise standards achieved by their pupils (Estyn).

The relevant Estyn Inspection reports provide grades against Key Questions and provide schools with recommendations for improvement.

You can find inspection reports on the Estyn website [www.estyn.gov.uk](http://www.estyn.gov.uk)

## Welsh Government categorisation of schools

In 2014, the Welsh Government introduced a new categorisation system.

It looks at each school's standards and how much a school is able to improve. This identifies the level of support schools require. Organisations such as the Central South Consortium (CSCJES) and the school improvement service then work with schools' leaders to identify, provide and/or broker any support required for further improvement.

The categorisation system is described in Table 28 below:

Table 28: Categorisation System	
Category of support	What the category means
Green	A highly effective school which is well run, has a strong leadership and is clear about its priorities for improvement
Yellow	An effective school which is already doing well and knows the areas it needs to improve.
Amber	A school in need of improvement which needs help to identify the steps to improve or to make change happen more quickly.
Red	A school in need of greatest improvement and will receive immediate, intensive support.

A school's colour-coded category is decided by how it is rated for standards (1-4) and for how able it is to improve (A-D).

1 is the best rating for standards and A is the best for improvement.

Updated categorisations for each school are published every year in January.

More information about the categorisation scheme can be found in the Welsh Government's parents' guide to the National School Categorisation System here:

<http://gov.wales/docs/dcells/publications/150119-parents-guide-en.pdf>

## Ysgol Gyfun Gymraeg Glantaf

Ysgol Gyfun Gymraeg Glantaf was last inspected by Estyn in May 2017.

At this time the school's performance was judged as good and prospects for improvement were judged as adequate.

Following a further monitoring visit in November 2018, the school was judged to have made sufficient progress and was removed from the school from the list of schools requiring Estyn review.

In the most recent Welsh Government School Categorisation at January 2020, Ysgol Gyfun Gymraeg Glantaf was categorised at Yellow (An effective school which is already doing well and knows the areas it needs to improve).

An assessment provided by the Central South Consortium in Autumn 2021 gave the following evaluation:

- In key stage 3 (ages 11 – 14), most pupils are successful in achieving the core subject indicator (CSI) and outcomes over the last three years are higher than national averages across all core subjects at level 5+, 6+ and 7+. Most pupils have made 1 level of progress or more during the key stage.
- The school has appropriate systems to track progress which provides useful information for staff on the achievement of various groups of pupils.
- By collaborating with a number of external agencies, the school is doing very good work with vulnerable pupils to support the wellbeing, health and social development of these pupils to ensure a healthy attitude to learning.

## How would standards at the school be affected by the changes

### Standards

The Council has made a clear commitment to continuing the investment in, and improvement of, Cardiff schools to make sure every child has the best possible start in life ([www.cardiffcommitment.co.uk](http://www.cardiffcommitment.co.uk)).

The Council works closely with the governing bodies of schools to make sure that standards in schools are high, that teaching is good, and that leadership and governance is strong.

Standards at Ysgol Gyfun Gymraeg Glantaf are good. Establishing additional Specialist Resource Base provision at the school would provide appropriate high quality school places for young people with autism spectrum condition. It is not expected that the proposal will impact on standards at the school.

The proposal is not expected to have any negative impact on the quality of standards of education at the school as a result of the proposed changes.

### Teaching and learning experiences

The proposal is not expected to have any negative impact on teaching and learning experiences at Ysgol Gyfun Gymraeg Glantaf.

### Care support and guidance

All schools have an appropriate range of policies and provision in place to promote pupils' health and wellbeing.

The school is committed to providing an environment in which learning is valued and pupils achieve their potential in a happy, safe environment in which they show respect and tolerance for each other.

The Council would work with the leadership of the school to make sure everyone understands their responsibility for helping to improve and sustain care support and guidance.

### Leadership and Management

The Council would continue to work with the leadership of the school to make sure everyone understands their responsibility for helping to improve and sustain high performance. It would support the school to have a good relationship with parents and other partners so that pupils receive a high-quality education.

The proposed changes would be planned carefully so that the school's leadership and governance is not disrupted, which could have a negative impact on educational standards.

## Additional support for pupils

Table 29 below shows the percentages of:

- Pupils with Additional Learning Needs
- Pupils receiving Free School Meals
- Pupils with English as an Additional Language
- Minority Ethnic pupils at each of the schools.

**Table 29: Bishop of Llandaff Church in Wales High School**

All pupils	%
% of Pupils on School Action	9.9
% of Pupils on School Action Plus	5.8
% of Pupils with a statement of ALN	2.1
% of Free School Meals Pupils- 3 year average	8.7
% of Pupils with English as an Additional Language	n/a
% of Minority Ethnic Pupils	11.1

### Impact on pupils with Additional Learning Needs (ALN)

The current expertise at the school would be maintained. The establishment of additional learning needs provision for learners with autism spectrum condition would provide opportunities for staff development and for enhancing pupils' learning.

The Council acknowledges that a change in environment can be unsettling and upsetting for children with additional learning needs. Pupils would be supported to enable them to adapt to the changes proposed.

### How would support for pupils with English as an Additional Language be affected?

Pupils that receive support because they have English as an additional language can be supported in any school in Cardiff.

There is no information available that suggests that the proposal would have a negative effect on how children with English as an additional language are supported. The school would continue to provide support that is appropriate to the individual needs of each pupil.

## How would pupils receiving Free School Meals be affected?

Some of the funding that a school receives is based on the number of pupils in the school who receive Free School Meals. All schools in Cardiff would receive funding for these pupils.

There is no information available that suggests that the proposal would have a negative effect on pupils at the school who receive Free School Meals.

## How would Minority Ethnic Pupils be affected?

The needs of individual pupils are assessed and provided for as appropriate. There is also no information available that suggests that the proposal would have a negative effect on provision for any ethnic group.

## What are the benefits of the proposed change?

- The proposal would increase the number of Specialist Resource Base places for secondary aged learners with autism spectrum condition and would contribute towards meeting projected demand.
- The opportunity to employ additional specialist staff and to work more closely with specialist services in Cardiff would enhance the school's inclusive teaching. This would benefit all pupils in the school.

Further information in respect of the benefits of expanding specialist provision is set out on page 81 of this document.

## Potential disadvantages of the proposed change

- Some pupils with additional learning needs can find change difficult. They may find changes to buildings unsettling. We know they will need carefully planned support to adapt to the changes. However, there would be sufficient time to plan and support such a change.
- There is potential for a small increase in traffic around the school site at the start and end of the day. The Council would work with the Governing Body of the school to develop a Travel Plan to minimise any potential disruption.

## Alternative options considered

The Council is seeking to provide a better distribution of specialist resource provision across the city. This would improve access for pupils, and reduce travel times for many pupils, as well as increasing the number of places available. A number of other expansions, and new provision at other schools city-wide, are also proposed.

At present, there is no dedicated Welsh-medium Specialist Resource Base provision for learners aged 11 - 19 with Autism Spectrum Condition in Cardiff

Alternative options to the establishment of an additional Specialist Resource Base at Ysgol Gyfun Gymraeg Glantaf could include:

- the establishment of new specialist provision on other school sites and/or providing support in schools without the formal establishment of a base.

However, the standards at Ysgol Gyfun Gymraeg Glantaf are good. The school has experience of successfully operating a Specialist Resource Base. Establishing additional Specialist Resource Base provision at the school would provide an increased number of appropriate high quality school places in purpose-built facilities.

The establishment of additional Specialist Resource Base provision at Ysgol Gyfun Gymraeg Glantaf is therefore considered to be a preferred option.

## Human Resources Matters

HR People Services will work with the Governing Body to address the HR implications arising from the establishment of an Autism Spectrum Condition Specialist Resource Base alongside the existing Specialist Resource Base at the school and the resulting need for additional staffing.

Where the Governing Body have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of the establishment of the Autism Spectrum Condition Specialist Resource Base will provide opportunities for school-based staff on the school redeployment register.

## Transport matters

The Council applies the two-mile statutory qualifying walking distance criteria for pupils to qualify for free home to school transport to specialist resource bases. Some specialist resource base learners who live within two miles of the school may be provided with free transport due to their individual learning needs and social issues.

Other learners are able to travel independently or with parent/carers and if resident within the two-mile qualifying distance may not be eligible for Learner Transport. These pupils as well as staff and school visitors would benefit from any required improvements in facilities for active travel to school or public transport facilities.

As the Council is seeking to provide a better distribution of specialist resource provision across the city, it is expected that the average travel distance to specialist resource bases for individual learners would reduce in future.

A school proposal to establish Additional Learning Needs facilities may require a Transport Statement which will identify measures to be included as part of the application to maximise travel by sustainable modes.

The Council's current Corporate Plan includes a commitment to every school in Cardiff developing an Active Travel Plan. Such a plan will identify actions by the school to support and encourage active travel to school and also any improvements to on-site and off-site infrastructure required to facilitate active journeys.

Increasing travel to school by active modes (walking, cycling and scooting) by ensuring safe facilities are provided will have a positive impact on children's health and wellbeing.

A number of initiatives have successfully demonstrated support and encouragement for active and sustainable travel amongst the Additional Learning Needs cohort, which would be offered to learners as appropriate, including Independent Travel Training for older pupils (to be reviewed each year), cycle maintenance and cycle training.

With the expected increased demand for Learner Transport, the existing facilities for drop-off and pick-up will be reviewed to confirm they are suitable to accommodate the appropriate numbers of vehicles.

## Have your say

At the end of the booklet is a questionnaire. This is your chance to let the Council know what you think about the proposal. You can give a response to all of the questions, or just respond to some of them, as you prefer.

Alternatively, you can send us your views in one of the following ways:

- Completing the online response form at [www.cardiff.gov.uk/ALNSchoolproposals](http://www.cardiff.gov.uk/ALNSchoolproposals)
- Email your views to [schoolresponses@cardiff.gov.uk](mailto:schoolresponses@cardiff.gov.uk)
- Write to us at the following address: School Organisation Planning, Room 401, County Hall, Atlantic Wharf, Cardiff, CF10 4UW.

The Council will consider everyone's views before deciding whether to go ahead with the proposed changes.

**The closing date for responses to this proposal is 1 February 2022.**

**Information Relevant  
to all Proposals**



# Information Relevant to all Proposals

## How would the changes affect other schools?

Specialist Resource Bases in Cardiff provide specialist provision for the whole of the City and County of Cardiff. There are not enough places to meet demand in maintained provision. This has an impact on existing schools where in some cases there may be a greater number of pupils on roll than the Published Admission Number (PAN) or desired number in a specialist resource base.

Cardiff currently has to rely on purchasing some places in out of county provision and independent schools to fulfil its statutory duties. There could be a longer-term impact on out of county providers and on independent schools as there is likely to be a reduction in the number of places purchased by the Council.

## Admission arrangements

There are no planned changes to the Council's policy on the admission of children to schools as a result of these proposals.

Detailed information about admission arrangements is in the Council's Admission to School booklet. You can find this information on the Council's website at [www.cardiff.gov.uk](http://www.cardiff.gov.uk).

Admissions to specialist provision are managed by the Council, subject to a statement of Special Education Needs (SEN). Under the ALN Code, placement will be subject to an Individual Development Plan (IDP).

## Learner Travel Arrangements

Under these proposals there are no plans to change the Council's policy on the transport of children to and from schools.

Any pupils affected by this proposal would be offered the same support with transport as is provided throughout Cardiff and in accordance with the same criteria that apply across Cardiff. The Council's transport policy can be viewed on the Council's website ([www.cardiff.gov.uk](http://www.cardiff.gov.uk)).

There is a statutory legal obligation on the Council to provide free home to school transport to primary school pupils who live 2 miles or more from the nearest suitable school, as measured by the shortest available walking route.

When deciding which is the nearest suitable school, the Council must consider any disability a child has and any special educational needs (SEN).

## Financial Matters

Some of the proposed changes set out in this document would incur capital costs for the Council, for building works and / or adaptation of buildings. They would also incur revenue costs for the Council, in employing staff.

At this stage of the consultation there are no financial commitments. Based on the consultation outcome a range of options will be developed. A full financial evaluation will then take place. This will ensure affordability and limit budgetary pressures on the Council.

The additional places would need to be funded from the existing delegated schools budget. Currently high-cost provision for some pupils is delivered either in a number of ways. Some learners are placed in schools outside of Cardiff, or in independent school. Some learners remain in mainstream schools, with "Complex Needs Enhancement" payments made to the school to provide appropriate support.

Further work will be undertaken to establish whether or not the savings on these placements, or on enhanced payments to schools, will cover the additional costs of proposed additional places.

This work will also consider how the Council's home to school transport costs would change. The increased number of specialist places proposed may increase number of children transported from home to school by the Council. The increased number of places available in special schools and bases may reduce the average travel distance and average journey cost.

## Health provision

The proposals to expand specialist provision at the schools included in these proposals will have implications for health and other specialist services. These services work in partnership with schools to meet Additional Learning Needs. An additional factor is the ALN Reform Act 2018, which will introduce new responsibilities for health, education and social care to work together to coordinate assessment and provision. The Act 2018 will be implemented over a three-year period, beginning in September 2020.

In order to address these challenges together, the Council and Cardiff and the Vale University Health Board are undertaking a joint review of health and specialist provision in Cardiff special schools and pupil referral units. The findings of the review, overseen by a project group of representatives from health, education, social services, schools, and parents, will inform the design of the specialist provision.

## Governance Arrangements

There are no proposed changes to governance arrangements arising out of these proposals.

## Impact of the proposals on the Welsh Language

The level of special educational needs/ additional learning needs in the Welsh-medium sector has historically been lower than in the English medium sector. This has been changing over the last 4-5 years, with schools reporting an increased incidence of Additional Learning Needs, in all areas of need.

A review of additional Learning Needs in the Welsh-medium sector was undertaken with Welsh medium schools in 2016 to inform the Welsh in Education Strategic Plan (WESP). Schools reported a small but significant number of examples of pupils with ALN leaving the Welsh-medium sector in order to access specialist resource bases or special schools.

There was also some anecdotal evidence to suggest that some families who would otherwise choose Welsh-medium education opt instead for English medium if their child has Additional Learning Needs, through concern that their child may need to transfer to the specialist sector at a later date.

Through the WESP, Cardiff has invested in specialist provision in the sector, including some capacity to respond to growing demand and to generate more confidence in the availability of specialist provision in the sector.

A new primary base was established at Ysgol Gymraeg Pwll Coch, within the catchment area of Ysgol Gyfun Gymraeg Glantaf, where the secondary base is established. The two bases cater for learners with severe learning difficulties, providing a specialist curriculum and supporting a range of secondary needs including physical and medical needs, speech and language difficulties and autism.

In 2021 there is growing demand for resource bases for pupils with autism, who are average to high achievers, and would need a more integrative model of support than that provided by the two existing bases. There are currently 8 secondary aged learners, and 15 primary aged learners in Welsh-medium schools who would benefit from placement in an Autism Spectrum Condition base. This is a short-term priority, given the risk that if current placements fail, the only option would be to offer a transfer to an English medium setting.

A primary wellbeing class has been established, hosted at Ysgol Gynradd Pen y Groes. The wellbeing class works flexibly to address needs in different age phases, or to provide an outreach model, depending on current need. This consultation outlines proposals to establish a 30 place Autism Spectrum Condition Specialist Resource base at Ysgol Gyfun Gymraeg Glantaf in addition to the existing 30 place Specialist Resource base at the school.

To support emotional health and wellbeing needs in secondary phase, a 'virtual' base/ Pupil Referral Unit has been piloted across the three secondary schools, starting in 2018. The pilot is due for further review in 2021.

The priority is to ensure the three schools have adequate facilities and accommodation to provide effective Step 3 and 4 provision, complemented by the virtual base/ PRU. Medium term, the virtual base/ PRU will eventually need a fixed location at one of the schools, with designated accommodation, to reduce the risk that young people with the most complex needs may need to leave the Welsh sector to access more specialist provision.

As the Welsh-medium sector continues to grow it will be important to develop additional provision in anticipation of the need, to ensure Welsh-medium education is a genuine choice for learners with complex Additional Learning Needs.

The pool of ALN qualified and experienced teaching staff is limited in number, in comparison to the English sector. Any plan to develop Welsh medium specialist provision will need to be supported by an Additional Learning Needs Workforce Development Plan.

In accordance with the timetable set by Welsh Government, the Council is working closely with its partners on the Cardiff Welsh Education Forum to develop the new ten year WESP for the city

A separate consultation on the draft WESP 2022 – 2032 is underway and seeks views on how best to grow Welsh-medium education and on how to meet the local targets set by Welsh Government, in order to inform future proposals. The WESP will set out how the Council will increase the provision of Welsh-medium education for pupils with additional learning needs. This consultation can be found at [www.cardiff.gov.uk/WelshStrategyConsultations](http://www.cardiff.gov.uk/WelshStrategyConsultations).

Following consultation, it is expected the plan will be submitted for approval to the Welsh Government in early 2022. The first ten-year Plan will commence on 1 September 2022 and expire on 31 August 2032.

## Equalities

An Equality Impact Assessment (EIA) is a process that looks at a policy, project or scheme to make sure it does not discriminate against anyone based on the protected characteristics set out in the Equality Act 20 (age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race, religion/ belief, sex, sexual orientation).

An initial Equality Impact Assessment has been carried out. It concluded that the proposed changes would not negatively affect a particular group in society.

This assessment will be reviewed after the consultation and at key points if the proposals were to proceed. If the proposal goes ahead, another equality impact assessment would be carried out at the design stage. This would identify accessibility to the new provision. The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design 2014 as well as building regulations such as BS8300, Part M and relevant Building Bulletins.

## Community Impact

The following are taken into account when considering a proposal: Public Open Space, parkland, noise and traffic congestion. The schools included in these proposals and the Council will work with any community groups to make sure the proposals avoid any negative impacts if possible.

A community impact assessment has been undertaken for these proposals and is available to view at [www.cardiff.gov.uk/ALNschoollproposals](http://www.cardiff.gov.uk/ALNschoollproposals).

## Wellbeing of Future Generations

In line with the Well-being of Future Generations Act Cardiff's Band B programme is committed to providing Local Schools for Local Children, together with encouraging use of sustainable modes to travel to schools, such as walking and cycling. Each School project takes into account key transport issues when they are being designed and the firm need to provide safer routes to encourage walking, cycling and other active travel modes to schools.

With the current investments in ICT across the city, student movements may be further reduced as mobile technology develops further allowing for flexible teaching methods. These have the potential to result in a more efficient Travel Plan and further contribute to the Council's targets to reduce its carbon emissions.

In order to maximise the long-term impact of this significant investment, any design taken forward for each school included in this proposal would be developed to ensure the delivery of high-quality modern facilities that are able to respond to the current pupil populations needs and support the delivery of effective teaching and learning methods. They would also incorporate the flexibility to take account of changes depending on need as time progresses, such as changing demographics and pupil numbers, changing curriculum and changing types of pupil needs.

## Potential Disruption to Pupils

The Council has significant experience in the successful delivery of building projects on the sites of occupied schools as a result of progressing a large and growing school organisation programme.

Any building work carried out would be managed effectively in consultation with the schools included in these proposals to ensure that the curriculum continues to be delivered and that high education standards and safety standards are maintained.

## Next steps, how to make your views known and feedback form

### What happens next?

#### Key Dates

The Council will collect and summarise the feedback from this consultation. Council officers will then report this to the Council's Cabinet to report stakeholder views to elected members and to inform decision making. This consultation report will be available for anyone to view/download on the Council website. You can also get a copy by using the contact details in this document.

If the proposals are agreed to proceed following consultation, there are a number of further stages that the Council would have to go through before a final decision is made.

These stages are set out in Table 30 below:

**Table 30: Future stages (This timetable may be subject to change)**

Statutory Process	Timescale
Consultation Period	14 December 2021 – 01 February 2022
Consultation report considered by the Council Cabinet and published on the Council website	March 2022
Expected date for start of Objection Period, when statutory notice has been issued (when formal objections can be made)	May 2022
Expected date for end of Objection Period	June 2022
Final decision (determination) by the Council's Cabinet	July 2022
Objection report published on the Council website and notification of Cabinet's decision	July 2022

### Consultation period

The consultation period for these proposals starts on 14 December 2021 and 01 February 2022.

The Council and the Governing Bodies of Whitchurch High School and The Bishop of Llandaff Church in Wales High School will publish a consultation report on their websites. The report must be published at least two weeks prior to the publication of any statutory notices.

### You can also ask for a hard copy of the report.

The report will go over the issues raised during the consultation period and give the Council's / Governing Bodies response to these issues. The report will also contain Estyn's view of the proposals.

The Council's Cabinet will consider the consultation report and decide whether or not to go ahead with the proposed changes to Llanishen High School, Willows High School and Ysgol Gyfun Gymraeg Glantaf.

The Governing Bodies of Whitchurch High School and The Bishop of Llandaff Church in Wales High School will consider the consultation report and decide whether or not to go ahead with the proposed changes relevant to their school.

If the Cabinet decides to continue with the changes to Llanishen High School, Willows High School and Ysgol Gyfun Gymraeg Glantaf, the Council must publish a document called a 'statutory notice'. This is an official statement saying that the changes will go ahead.

If the Governing Bodies of Whitchurch High School and The Bishop of Llandaff Church in Wales High School decide to continue with the changes, they must also publish a 'statutory notice'.

## Statutory Notice

A statutory notice is the formal publication of a finalised proposal. The approval to publish a statutory notice must be given by the Council's Cabinet/ Governing Body. This would only be considered after the Cabinet / Governing Body have received a report on all the consultation responses. This is a legal requirement as outlined in the School Organisation Code 2018.

The Council would publish the statutory notice(s) on its website. The Governing Bodies would publish the notice(s) on the school and Cardiff Council website. Copies of the notice(s) would also be put up at or near the main entrance to the school(s)/site(s) affected by the notice.

Schools that are affected would also be given copies of the notice to give out to pupils, parents, guardians, and staff members (the schools may also distribute the notice by email). The notice sets out the details of the proposals and asks anyone who wants to object to do so. Objections must be written. They must be sent to the Council / relevant Governing Body within the dates given on the notice.

## Determination of the proposals

Cardiff Council Cabinet would determine the proposals for Llanishen High School, Willows High School and Ysgol Gyfun Gymraeg Glantaf. This means they will make a final decision on whether the changes go ahead. The Cabinet may decide to approve or reject the proposal, or they may approve the proposal with some changes (modifications). The Cabinet will take any objections received in the Objection Period into account when making this decision.

If there are no objections to the proposals for Whitchurch High School and The Bishop of Llandaff Church in Wales High School, the Governing Bodies would determine the proposals. The Governing Bodies may decide to approve, reject or approve the proposals with modifications. The Governing Bodies will take any objection received in the Objection Period into account when making this decision.

If there were objections to the proposals for Whitchurch High School or The Bishop of Llandaff Church in Wales High School, the proposals would be referred to the Local Authority (Cardiff Council) for determination within 35 days of the end of the objection period. The Local Authority has 16 weeks from the end of the objection period to determine the proposals.

## Decision Notification

After determination of the proposals all interest parties will be informed of the decisions. Decisions will also be published on the Council and school websites.

# Have Your Say!

You can complete this response form online at [www.cardiff.gov.uk/ALNschoollproposals](http://www.cardiff.gov.uk/ALNschoollproposals)

We are proposing to:

- increase the designated number at the Whitchurch High School Specialist Resource Base for learners with complex needs from 70 to 100 from September 2022
- establish a 30 place Specialist Resource Base for learners with complex learning needs at Willows High School from September 2023
- increase the designated number at the Llanishen High School Specialist Resource Base for learners with Autistic Spectrum Condition from 20 to 45 places from September 2022
- increase the designated number at The Marion Centre Specialist Resource Base for learners with Autistic Spectrum Condition from 42 to 66 places from September 2022
- establish a 30 place Resource Base at Ysgol Gyfun Gymraeg Glantaf for learners with Autistic Spectrum Condition alongside the existing 30 place Specialist Resource Base from September 2023

Your views matter, please tell us what you think about the proposal by:

- Completing and returning the accompanying questionnaire to the address given at the bottom of the form.
- Completing the online response form at [www.cardiff.gov.uk/ALNschoollproposals](http://www.cardiff.gov.uk/ALNschoollproposals)
- Or if you prefer you can e-mail your views to: [schoolresponses@cardiff.gov.uk](mailto:schoolresponses@cardiff.gov.uk)

**The closing date for responses to this consultation is 1 February 2022. Unfortunately, no responses received after that date can be considered.**

### 1. Which of the following are you responding as?

- Parent
- Teacher – please specify your school:
- School governor – please specify your school:
- Other – please specify:

**2. Do you have a child/children enrolled at the following schools? (tick all that apply)**

<input type="checkbox"/> Whitchurch High School	<input type="checkbox"/> Willows High School
<input type="checkbox"/> Llanishen High School	<input type="checkbox"/> Bishop of Llandaff
<input type="checkbox"/> Ysgol Gyfun Gymraeg Glantaf	<input type="checkbox"/> N/A
<input type="checkbox"/> Other please specify:	<input type="text"/>

**3. Do you support the plans put forward to improve the provision for Children and Young People with additional learning needs?**

Yes     No     Don't know

**4. Do you support the proposal for each of the school sites?**

Tudalen 663

School and proposal in brief	Yes	No	No opinion
<b>Whitchurch High School</b> - increase the designated number at the Whitchurch High School Specialist Resource Base for learners with complex learning needs from 70 to 100 from September 2022			
<b>Willows High School</b> - establish a 30 place Specialist Resource Base at Willows High School for learners with complex learning needs from September 2023			
<b>Llanishen High School</b> - increase the designated number at the Llanishen High School Specialist Resource Base for learners with Autistic Spectrum Condition from 20 to 45 places from September 2022			

School and proposal in brief	Yes	No	No opinion
<b>The Marion Centre at The Bishop of Llandaff</b> - increase the designated number at The Marion Centre Specialist Resource Base for learners with Autistic Spectrum Condition from 42 to 66 places from September 2022			
<b>Ysgol Gyfun Gymraeg Glantaf</b> - establish a 30 place Specialist Resource Base for learners with Autistic Spectrum Condition at Ysgol Gyfun Gymraeg Glantaf alongside the existing 30 place Specialist Resource Base from September 2023			

**5. If you do or do not support the proposed changes than please explain why?**

**6. Would you like to suggest any changes or alternatives?**

## 7. Additional comments

Name:  Postcode:

Address:

**The closing date for responses to this consultation is 1 February 2022.**

The Council is not able to consider any consultation responses received after this date.

Consultation responses will not be counted as objections to the proposal.

Objections can only be registered following publication of a statutory notice.

If you wish to be notified of publication of the Consultation report please provide an email address. If you do not provide an email address we cannot keep you up to date.

Email:

Please return this form to the School Organisation Planning Team, Room 401, County Hall, CF10 4UW or by email to [schoolresponses@cardiff.gov.uk](mailto:schoolresponses@cardiff.gov.uk) by no later than 1 February 2022.

**THANK YOU FOR YOUR COMMENTS**

## About You

Please provide your postcode below to allow us to more accurately pinpoint respondents' views and needs by area:-

### What was your age on your last birthday?

Under 16     25-34     45-54     65-74  
 16-24     35-44     55-64     75+     Prefer not to say

### Are you...?

Female     Male     Other     Prefer not to say

### Do you identify as a disabled person?

Yes     No     Prefer not to say

### Please tick any of the following that apply to you:

Deaf/ Deafened/ Hard of hearing     Visual impairment     Long-standing illness or health condition (e.g. cancer, diabetes, or asthma)  
 Mental health difficulties     Wheelchair user     Prefer not to say  
 Learning impairment / difficulties     Mobility impairment     Other

Please specify

### What is your ethnic group?

Where the term 'British' is used, this refers to any of the four home nations of Wales, England, Northern Ireland and Scotland, or any combination of these.

<input type="checkbox"/> White - Welsh/English/Scottish/Northern Irish/British	<input type="checkbox"/> Asian/Asian Welsh/British - Bangladeshi
<input type="checkbox"/> White - Irish	<input type="checkbox"/> Asian/Asian Welsh/British - Indian
<input type="checkbox"/> White - Gypsy or Irish Traveller	<input type="checkbox"/> Asian/Asian Welsh/British - Any other
<input type="checkbox"/> White - Any other white background	<input type="checkbox"/> Black/African/Caribbean/Black Welsh/British - African
<input type="checkbox"/> Mixed/Multiple Ethnic Groups - White & Asian	<input type="checkbox"/> Black/African/Caribbean/Black Welsh/British - Caribbean
<input type="checkbox"/> Mixed/Multiple Ethnic Groups - White and Black Caribbean	<input type="checkbox"/> Black/African/Caribbean/Black Welsh/British - Any other
<input type="checkbox"/> Mixed/Multiple Ethnic Groups - White and Black African	<input type="checkbox"/> Arab
<input type="checkbox"/> Mixed/Multiple Ethnic Groups - Any other	<input type="checkbox"/> Any other ethnic group (please specify)
<input type="checkbox"/> Asian/Asian Welsh/British - Chinese	<input style="width: 150px;" type="text"/>
<input type="checkbox"/> Asian/Asian Welsh/British - Pakistani	<input type="checkbox"/> Prefer not to say

**The information you have provided above will be processed by Cardiff Council in line with the Data Protection Act 2018 and General Data Protection Regulation. The information provided to us in relation to this consultation will be treated as confidential but it may be used by the Council or disclosed to others when required by law. The purpose of processing the personal data is required to perform a specific task in the public interest. Any responses received can be requested under the Freedom of Information Act and may have to be made public, however any information that would identify an individual such as name and address would be removed.**

For further information on how Cardiff Council manages personal information, see our full Privacy Policy on the Council's website

[https://www.cardiff.gov.uk/ENG/Home/New\\_Disclaimer/Pages/default.aspx](https://www.cardiff.gov.uk/ENG/Home/New_Disclaimer/Pages/default.aspx)



**The Governing Body of  
The Bishop of Llandaff Church in Wales High School**

## **Consultation Report**

### **The proposed expansion of The Marion Centre Specialist Resource Base**

#### **1. Reason for this Report**

- 1.1 The Governing Body of The Bishop of Llandaff Church in Wales High School in partnership with Cardiff Council (hereafter also referred to as the "Council") recently consulted on a proposal to increase the designated number at The Marion Centre Specialist Resource Base (hereafter also referred to as "SRB") from 42 to 66 students from September 2022.
- 1.2 In accordance with the requirements of the Welsh Government School Organisation Code the Governing Body must publish a consultation report
  - summarising each of the issues raised by consultees;
  - responding to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons; and
  - setting out Estyn's response to the consultation in full, responding to Estyn's response by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons.

#### **2. Consultation**

- 2.1 The Governing Body agreed to hold a public consultation on proposals to increase the designated number at The Marion Centre Specialist Resource Base from 42 to 66 from September 2022.
- 2.2 At its meeting on 14<sup>th</sup> October 2021, the Cabinet of the Council noted that a statutory consultation on the proposal was to be undertaken and authorised officers to provide all reasonable assistance.
- 2.3 The consultation on the proposed expansion of The Marion Centre was undertaken as part of the Councils wider proposals for the establishment/expansion of secondary complex learning needs and specialist provision for autism spectrum disorder (including Specialist Resource Base).
- 2.4 The consultation ran from 14<sup>th</sup> December 2021 until 1<sup>st</sup> February 2022 and was supported by Cardiff Council.
- 2.5 The consultation process for all proposals involved
  - Publication of a bilingual consultation document outlining background; rationale and implications to parents; Headteachers and Chairs of Governors; all Members of local wards, local residents and other stakeholders (a copy of the consultation documents can be seen at Appendix 1);
  - Publication of a bilingual summary document setting out the main points of the consultation documents (a copy of the summary documents can be seen at Appendix 2);
  - Publication of information in community languages upon request;
  - Consultation meetings via Microsoft Teams with staff at The Bishop of Llandaff Church in Wales High School (notes from the meetings can be seen at Appendix 3);
  - Student survey with student representatives at The Bishop of Llandaff Church in Wales High School (a copy can be seen at Appendix 4);
  - A public consultation meeting via Microsoft Teams at which the proposal was explained by Council officers and questions answered (notes from the meetings can be seen at Appendix 5);

- Drop-in sessions were offered via Microsoft Teams where Council officers were available to answer questions (there were no requests for drop-in sessions);
  - Letters setting out details of the proposals and where further information could be found were sent to local residents and businesses in the area surrounding the school sites subject to the proposed changes
  - A communication campaign via social media;
  - A consultation response slip for return by post or email, attached to the consultation documents and summary documents; and
  - An online response form at [www.cardiff.gov.uk/ALNSchoolproposals](http://www.cardiff.gov.uk/ALNSchoolproposals).
- 2.6 For stakeholders who did not have access to digital platforms, the opportunity to discuss the proposed changes via telephone was available.
- 2.7 The views expressed at Council organised meetings, drop-in sessions, telephone calls, and on paper or electronically through the appropriate channels, have been recorded.
- 2.8 Views were sought from interested stakeholders via an online survey and a hard copy version of the survey within the consultation document.
- 2.9 The details presented in this report represent the views expressed during the consultation process. These include the wider stakeholder survey, formal responses, e-mail responses, views expressed at public meetings, drop-in sessions, telephone calls and the student consultation survey.
- 2.10 The views expressed in the wider stakeholder surveys reflect those raised in the e-mail responses received.

### **3. Responses received during the consultation period**

- 3.1 As set out in 2.3, the consultation on the proposed expansion of The Marion Centre was undertaken as part of the Councils wider proposals for the establishment/expansion of secondary complex learning needs and specialist provision for autism spectrum disorder (including Specialist Resource Bases). The consultation included proposals for the establishment/expansion of additional learning needs provision at five secondary schools across Cardiff.
- 3.2 In total, 114 responses to the consultation on the proposals for secondary complex learning needs and autism spectrum condition Specialist Resource Base provision were received by the Council including 106 online responses and a further 8 email responses regarding the specific proposals consulted on.
- 3.3 The Council received a number of formal responses to the strategic expansion of ALN provision which did not reference The Bishop of Llandaff Church in Wales High School. This includes a response from Estyn. Details of which can be found at [Cabinet 10 March 2022 SOP Complex learning needs App 6.pdf \(modern.gov.co.uk\)](http://modern.gov.co.uk/Cabinet_10_March_2022_SOP_Complex_learning_needs_App_6.pdf).
- 3.4 Of the 106 online responses received, 84 respondents replied to the proposal to increase the designated number at The Marion Centre Specialist Resource Base for students with autism spectrum disorder from 42 to 66 places from September 2022. One respondent identified as a parent of a child/children enrolled at the school.
- 3.5 Of the 84 online responses, over four fifths (86.9%) agreed with the proposal. If 'Don't know' responses are removed from the analysis, then agreement rises to 98.6%.
- 3.6 A summary analysis of the responses received can be seen at Appendix 6. The points raised during the consultation are set out italics below, grouped according to the issues raised where appropriate.
- 3.7 The Governing Body's response to each point can be seen underneath, under the heading "Appraisal of Views Expressed".

### **4. Formal Responses**

- 4.1 Estyn submitted a formal response to the Councils wider proposals for the establishment and/or expansion of secondary complex learning needs and specialist provision for autism spectrum disorder (including Specialist Resource Bases). They did not specifically provide a response in relation to The Marion Centre.
- 4.2 The response from Estyn covered all of the secondary complex learning needs and autism spectrum condition proposals consulted on and was not specific to the expansion of The Marion Centre.
- 4.3 Estyn welcomed the proposals which sits alongside others and aims to achieve a more equitable provision to better match current and future learning needs of students, across the City.
- 4.4 The response from Estyn sets out its view that the proposals are likely to, at least, maintain the standard of education provision in the area.



#### 4.5 Their response included the following points (for the full response, please see Appendix 7)

- We welcome this proposal which sits alongside others and aim to achieve a more equitable provision to better meet the current and future additional learning needs of students, across the City.
- We consider that the proposal is likely to, at least, maintain the standard of education provision in the area.
- The proposals outline very clearly five broad principles that all schools and settings should aspire to and attain in effectively supporting students with additional learning needs... It is not clear however, if there is an overall framework that will help to ensure the realisation of the principles. An overall framework could be used also to guide and assist schools that are either establishing or developing specialist resource base provision. Neither is it clear what support or networks exist, or will be created, to support leaders and staff as they develop and embed effective practices in meeting the needs of students.
- The proposer states that a joint review of health and specialist provision in Cardiff special schools and the student referral units is being carried out. However, it is not clear if the scope and outcomes of the review will benefit students in specialist resource bases across the city. Neither is it clear if the review will look at Welsh medium provision alongside English medium provision.
- The proposal gives appropriate attention to the current capacity and how it is unable to meet the demands for places for students with complex learning needs and autism spectrum condition and the deficit of places currently available.
- The proposer defines specialist resource bases as "a small class in a mainstream school for students with significant additional learning needs. All students attending a specialist resource base have a statement of SEN and are taught by specialist teachers and learning support assistants, and have opportunities to learn, play or socialise with other mainstream students..." It is unclear from the definition whether students, where appropriate, can access, with appropriate support where necessary, lessons alongside students that do not attend the specialist resource base. To comply with the Additional Learning Needs and Education Tribunal [Wales] Act the proposer needs to consider the admission of students with individual development plans.
- The proposal appears to provide effective opportunities for stakeholders, organisations, and members of the public to respond. This includes opportunities to access online public meetings. The process is clearly set out with timescales and how the consultation will be used.
- Statements made by the proposer for all schools about for example, teaching and learning experience and care, support and guidance are identical and do not provide a good enough account of how these are tailored to meet the specific additional learning needs of the students.
- The proposal considers suitable alternatives, for all schools, and outlines the possible benefits and disadvantages appropriately.
- The proposals consider appropriately the travel implications for students. All proposals foresee the likelihood of reducing travel time from home to school for some students. They also identify the need to further assess the suitability of drop-off and pick up point at each school site.
- The overall proposal considers the provision for the Welsh language but does not reflect the ambition laid out in the local authority's draft Welsh in Education Strategic Plan 2022-2032. The plan states that the authority aims to increase the number of secondary specialist places to be delivered in an SRB located at each Welsh-medium high school with different specialist needs in each base to achieve a level of specialist provision that is on a par with other sectors and responds appropriately to individual need. This proposal does not address this particular aim sufficiently well.
- The proposer states that there is an opportunity to employ specialist staff and to work more closely with specialist services in Cardiff. However, no further detail is provided and there is no guarantee that the opportunity will translate into a firm commitment or reality. The proposer further states that the pool of Welsh speaking ALN qualified and experienced teaching staff is limited in number, in comparison to the English sector. It goes on to state that any plan to develop Welsh medium specialist provision will need to be supported by an Additional Learning Needs Workforce Development Plan but lacks any detail or commitment about how this will come about.

- The proposer correctly asserts that students with additional learning needs may find change difficult. Other than recognising that change needs to be carefully planned, information on transition planning is very limited.

## **5. Appraisal of views expressed**

- 5.1 The Governing Body acknowledges the conclusions of Estyn on the overall merits of the proposals. Governors recognise the broad principles outlined in the consultation document reflect the approach the Council takes when developing Additional Learning Needs provision.
- 5.2 The Council provides a range of support to specialist settings. This includes professional learning for specialist staff; ALNCo forums and cluster meetings; termly additional learning needs updates for Headteachers; and regular updates for governing bodies.
- 5.3 The Council is currently working with the Health board to review services. This review will include consideration of specialist resource base provision in addition to special school provision.
- 5.4 Students attending specialist resource base provision benefit from specialist curriculum which is tailored to meet their needs.
- 5.5 In line with the requirements of the Additional Learning Needs and Education Tribunal [Wales] Act, the transition to individual development plans is being progressed.
- 5.6 The planning of Welsh-medium specialist places within the city is not the responsibility of the Governing Body of The Bishop of Llandaff Church in Wales High School.
- 5.7 The school continues to work with the Council to identify appropriate transition arrangements for students with additional learning needs. These arrangements are dependent on individual need and are progressed, as required. This support includes the provision/timing of funding, support with the recruitment and training of staff, the identification of needs and ongoing reviews.

## **6. Student consultation**

- 6.1 Representatives from The Bishop of Llandaff Church in Wales High School Student Congress responded to a student survey.
- 6.2 The students agreed it was a good idea to improve the provision for Children and young people with additional learning needs.
- 6.3 The students agreed with the proposal to increase the number of places at The Marion Centre as they were already there.
- 6.4 Concerns were raised regarding the volume of transport (taxis/cars) and the need to make sure that all students are safe. It was noted that multiple vehicles travelling on and off the site needs to be looked at. There are times of day when the site is very busy, and this could be dangerous.

## **7. Response to views expressed**

- 7.1 The Governing Body values the positive feedback by students on the proposed expansion of The Marion Centre, which reinforces the importance of the centre to the whole-school community, and its student body.
- 7.2 The Governing Body acknowledges the concerns raised by students in relation to increased traffic. The existing facilities for 'drop-off and pick-up' will be reviewed by the Council and the school to confirm they are suitable to accommodate the appropriate numbers of vehicles.
- 7.3 The Governing Body has been informed that proposals for the introduction of a 'School Street' on Rookwood Close are being developed by Cardiff Council. This would stop traffic entering at the start and end of the school day with the exception of resident traffic.

## **8. Other responses received**

- 8.1 Reasons for supporting the proposed changes included recognition of the need for increased additional learning needs provision within the City.
- 8.2 Whilst there was support for the expansion of specialist resource base provision at the school there were a number of concerns related to
- Safety, transport and traffic volume concerns due to tight site access;
  - The need for site adjustments to reduce risk of injury as a result of traffic on, accessing and egressing the site; and
  - Potential building and staff requirements to support the increased number of students.

## **9. Response to the views expressed**

- 9.1 Issues related to safety, transport and traffic volume are addressed in 7.2 and 7.3.
- 9.2 The Governing Body continues to work with the Council to ensure that suitable accommodation is provided for the increase in the number of students within the centre.
- 9.3 The Governing Body will continue to work with the Council Human Resources People Services to address the human resource implications arising from the permanent increase in the designated number at The Marion Centre Special Resource Base at the school and the resulting need for additional staffing.

## **10. Quality and Standards in Education**

- 10.1 The Bishop of Llandaff Church in Wales High School is recognised as a high performing school. In its most recent Estyn and Diocesan inspections, it was rated as 'excellent' in all categories. Copies of these reports are available via the school [website](#). The school continues to work tirelessly with all stakeholders, including the Diocese of Llandaff and the Council, to sustain the high-quality education offered at the school for all its students.
- 10.2 Standards at the school, which includes The Marion Centre, are consistently outstanding, as seen over a sustained period of time. Increasing the Specialist Resource Base provision would provide appropriate high-quality school places for young people with autism.
- 10.3 Existing students within The Marion Centre, receive a bespoke and high-quality educational experience that enables them to make strong progress in their learning and development, relative to their individual need. Since the creation of The Marion Centre, every student has successfully transferred to an appropriate onward destination, aged between 16 to 19 years.
- 10.4 Governors do not expect the proposal to impact on standards at the school. It is not expected to have any negative impact on the quality and/or standards of education at the school, or the centre, as a result of the proposed change.
- 10.5 The proposal is not expected to have any negative impact on teaching and learning experiences at the school. The school has an appropriate range of policies and provision in place to promote students' health and wellbeing; the school is committed to providing an environment in which learning is valued; and students achieve their potential in a happy, safe environment in which they show respect and tolerance for each other.
- 10.6 The school continues to work to make sure everyone understands their responsibility for helping to improve and sustain high performance. The school, including The Marion Centre, has excellent relationships with parents and other partners and, as a result, students receive a high-quality education.
- 10.7 The proposed changes would be planned carefully so that leadership and governance is not disrupted, which could have a negative impact on educational standards.

## **11. Transport Matters**

- 11.1 The Council applies the two-mile statutory qualifying walking distance criteria for students to qualify for free home to school transport to specialist resource bases. Some specialist resource base students who live within two miles of the school may be provided with free transport due to their individual learning needs and social issues. Other students that are able to travel independently or with parents/carers and residents within the two-mile qualifying distance may not be eligible for Student Transport. These students, as well as staff and school visitors, would benefit from any required improvements in facilities for active travel to school or public transport facilities.
- 11.2 The Council's current Corporate Plan includes a commitment to every school in Cardiff developing an Active Travel Plan. Such a plan will identify actions by the school to support and encourage active travel to school and also any improvements to on-site and off-site infrastructure required to facilitate active journeys.
- 11.3 Increasing travel to school by active modes (walking, cycling and scooting) by ensuring safe facilities are provided will have a positive impact on children's health and wellbeing. A number of initiatives have successfully demonstrated support and encouragement for active and sustainable travel amongst the Additional Learning Needs cohort, which would be offered to students as appropriate, including Independent Travel Training for older students (to be reviewed each year), cycle maintenance and cycle training.
- 11.4 With the expected increased demand for Student Transport suitable improved and/or expanded facilities for drop-off and pick-up may be required within the site to accommodate the appropriate numbers of vehicles. Other improvements may include modifications to the layout, signage and traffic control measures.

## **12. Community Impact**

12.1 It is not anticipated that the proposal will have any impact on the community.

## **13. Admission Arrangements**

13.1 Admissions to specialist provision are managed by the Council, subject to a statement of Special Education Needs (SEN) and/or under the ALN Code [Wales], placement will be subject to an Individual Development Plan (IDP).

13.2 There are no planned changes to the Council's policy on the admission of children to schools as a result of this proposal.

13.3 Detailed information about admission arrangements is contained within the Council's Admission to School booklet. This information can be found via the Council's website [www.cardiff.gov.uk](http://www.cardiff.gov.uk).

13.4 There are no planned changes to the school's policy on the admission of children to the school as a result of this proposal.

## **14. Recommendations**

14.1 The Governing Body is recommended to publish proposals in accordance with section 48 of The School Standards and Organisation (Wales) Act 2013 on proposals to increase the designated number at The Marion Centre Specialist Resource Base from 42 to 66 students from September 2022.

14.2 Note that in the event of there being no objections to the published proposals a further report will be considered by the Governing Body prior to implementation of the proposal.

14.3 Note that in the event of objections to the published proposal being received, the proposal would be referred to the Local Authority (Cardiff Council) for determination within 35-days of the end of the objection period. The Local Authority has 16-weeks from the end of the objection period to determine the proposals.

The following appendices are also available as part of the post-consultation report

Appendix 1 – Consultation Document;

Appendix 2 – Summary Document;

Appendix 3 – Notes of staff meeting;

Appendix 4 – Student survey;

Appendix 5 – Notes of public meeting;

Appendix 6 – Summary analysis of responses; and

Appendix 7 – Estyn's response to the consultation.

**The Bishop of Llandaff Church in Wales High School Governing Body  
Minutes of the Extra-ordinary Full Governing Body Meeting  
held on Wednesday, 14<sup>th</sup> June 2022 at 6.00pm  
Held via Microsoft Teams**

**Present:** Mathew Ashment (MA), Kate Bates (Chair), Marc Belli (Executive Headteacher), Jenan Girardi (JG), Susan Golding (SG), Efe Igurube (EI), David Oliver (DO), David White (DW)

**Also present:** Sarah Parry (Head of School), Chris Brown (Business Manager), Helen Treherne (Clerk)

Minute		Action
	<b>Opening prayers and welcome</b>	
	The Chair welcomed governors to the Extraordinary Full Governing Boyd meeting and DO led the opening prayer.	
<b>67.</b>	<b>To receive apologies for absence</b>	
	Apologies for absence received from Dr David Cassidy, Carol Cobert, Dr Julie Davies, Reverend Canon Mark Preece, Rachel Rees and Emily Tuttiett. Apologies were accepted.  <b>Resolved: To note and approve apologies for absence</b>	
<b>68.</b>	<b>To decide whether or not to proceed to statutory notice on the proposed expansion of The Marion Centre Specialist Resource Base</b>	
	<p>The Chair reminded governors that the purpose of the Extra-ordinary meeting was to decide whether or not to proceed to statutory notice on the proposed expansion of The Marion Centre Specialist Resource Base. The Governing Body of The Bishop of Llandaff Church in Wales High School, in partnership with Cardiff Council, had recently consulted on a proposal to increase the designated number at The Marion Centre Specialist Resource Base from 42 to 66 students from September 2022. The Governing Body had then published a consultation report which would be considered at this meeting.</p> <p>Although not present at the meeting, Dr David Cassidy and Carol Cobert had asked for their views to be taken into consideration as they were fully updated and had been present when the item had been discussed at previous Full Governing Body meetings. Issues and questions raised by governors had also been fully addressed at previous meetings. Governors had read all the relevant documentation in readiness for this meeting.</p> <p>The Chair reported that she and the Vice-Chair had met with the Executive Headteacher to ensure that the process was being undertaken correctly and that the documents responded appropriately to the questions raised by governors, as part of the process. Specifically, governors and students had raised concerns about the safety aspect of vehicles entering the school site and these concerns had been addressed and works were due to be carried out during the summer holidays, or half-term break. The Executive Headteacher added that governor concerns had been added to the post-consultation document, Cardiff Council had made recommendations and works had been scheduled to create a school zone to reduce the risk to students and staff. Furthermore, adjustments to the safety of the site were scheduled for the summer holidays/autumn term completion.</p> <p>SG asked if The Marion Centre students had access to Welsh medium education and was informed that the students had not. This was owing to the nature of their Statements of Educational Needs, where they were exempt from this. As a result, they would not be accessing the Welsh medium language. The Executive Headteacher indicated that the Estyn response commented about access to Welsh medium education in general across the city in</p>	

Signature of Chair: \_\_\_\_\_ Date: \_\_\_\_\_

point 5.6 of the post-consultation document. SG also asked if there were any families within the Centre who were first language Welsh speakers and was informed that there were none. The Executive Headteacher added that students in the Centre had considerable access to Welsh cultural development, but not Welsh language access, as their particular needs would preclude them from accessing that.

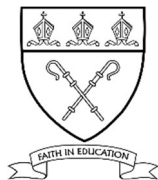
JG also asked if The Marion Centre students had access to mainstream lessons and was informed that, due to the complexity of their needs, they did not be access mainstream lessons. The Chair added that the needs of the students had become much more complex, specific and demanding since the opening of the Centre. The Executive Headteacher added that most of the students would find it challenging and difficult to interact with students in mainstream school. He emphasised that the Centre already catered for 66 students, and that suitable adjustments had already been made to the fabric of the building. He clarified that this proposal would allow an adjustment to site security in order to safeguard all students and staff at the school.

EI asked if the Centre students interacted with students in the mainstream school during breaks and lunchtimes and the Executive Headteacher replied that there may be some interaction between sixth form students, wellbeing students etc, but the Centre's students were educated within the Centre by specialist teachers and support staff. They interacted virtually exclusively with each other, as most found it difficult and distressing to interact with others. MA added that there could be some interaction outdoors, but this was monitored by staff and was viewed as positive interaction.

As there were no more questions, the Chair asked for a vote on whether or not to approve proceeding to statutory notice on the proposed expansion of The Marion Centre Specialist Resource Base. Governors unanimously agreed to proceed to statutory notice.

**Resolved: To approve proceeding to statutory notice on the proposed expansion of The Marion Centre Specialist Resource Base**

The Chair thanked governors for attending and the meeting was concluded at 6.40pm.



## The Bishop of Llandaff Church in Wales High School

### SCHOOL STANDARDS AND ORGANISATION (WALES) ACT 2013

#### ADDITIONAL LEARNING NEEDS PROVISION

**NOTICE IS HEREBY GIVEN** in accordance with Section 42 of the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code, that the Governing Body of The Bishop of Llandaff Church in Wales High School (herein after “the Governing Body”), having consulted such persons as appeared to them to be appropriate, propose to alter The Bishop of Llandaff Church in Wales High School, Rookwood Close, Llandaff, Cardiff, CF5 2NR to

- Increase the designated number at The Marion Centre Specialist Resource Base from 42 to 66 places.

It is proposed to implement the proposal from September 2022.

The school is a voluntary aided Church in Wales high school and is currently maintained by Cardiff Council.

A public consultation was undertaken on behalf of the Governing Body before deciding to publish this proposal. A consultation report containing a summary of the issues raised by consultees and the Governing Body’s responses and the views of Estyn on the proposed changes is available to view at

[Consultation on Expansion of The Marion Centre - The Bishop of Llandaff CiW High School](#)

The current school capacity is 1085 places including sixth form. The current number of students at the school is 961 (11 - 16) and 286 (Sixth Form).

There are currently 42 places at the Specialist Resource Base. The current number of students at the resource base is 66 and the proposal is to increase the number of places to 66.

There are no plans to change the school policy on the admission of children to school as a result of these proposals.

Admissions to the Specialist Resource Base are managed by the local authority and subject to a statement of Special Educational Needs (SEN) or Individual Development Plan (IDP), as appropriate.

Admissions to the Specialist Resource Base will continue to be separate to admission to the main school and to be in addition to the Published Admission Number (PAN).

Any arrangements for the transport of students will be made in accordance with the Local Authority’s existing policies on school transport.

Within a period of 28-days of the date of publication of these proposals, that is to say by 27<sup>th</sup> July 2022, any person may object to these proposals.

Objections should be sent to the Chair of Governors, The Bishop of Llandaff Church in Wales High School, Rookwood Close, Llandaff, CF5 2NR.

Objections may also be sent to the Chair of Governors using the following e-mail address: [SchoolResponses@cardiff.gov.uk](mailto:SchoolResponses@cardiff.gov.uk)

Please note that any such objection should contain the full name and postal address of the objector.

The Governing Body will publish a summary of any such objections made within the objection period (and not withdrawn in writing), together with its response, within the period of 28-days after the end of the objection period.

Dated this 30<sup>th</sup> day of June 2022



Kathryn Bates  
Chair of Governors

### **EXPLANATORY NOTE**

(This does not form part of the Notice but is intended to explain its general meanings)

The Bishop of Llandaff Church in Wales High School is an English-medium voluntary aided high school located in Llandaff.

The school hosts a specialist resource base, The Marion Centre, designated for Autism Spectrum Disorder.

To meet the demand for Specialist Resource Base places for students aged 11 - 19 with Autism Spectrum Disorder it is proposed to increase the designated number at The Marion Centre Specialist Resource Base from 42 to 66 places from September 2022.

The number of students at the base is 66.

It is proposed that the current specialist resource base accommodation would be improved and refurbished, creating additional classrooms and learning spaces.

In addition to the proposed increase in designated places at the specialist resource base for children with Autism Spectrum Disorder at The Marion Centre, further places for students with complex learning needs and autism spectrum disorder have been proposed for a number of schools within the local authority.

Details of these proposals and copies of the statutory notices can be seen at [Additional Learning Needs \(ALN\) provision \(cardiff.gov.uk\)](#)





# **The Governing Body of The Bishop of Llandaff Church in Wales High School**

## **Objection Report The proposed expansion of The Marion Centre Specialist Resource Base**

### **Reason for this Report**

1. Between 14 December 2021 and 01 February 2022, the Governing Body of The Bishop of Llandaff Church in Wales High School, in partnership with Cardiff Council, consulted on a proposal to increase the designated number at The Marion Centre Specialist Resource Base (hereafter also referred to as 'SRB') from 42 to 66 students from September 2022.
2. The consultation set out the proposal and the reasons for the proposed change. The consultation process followed Welsh Government guidelines and was an opportunity for stakeholders to learn about the proposal and for the Governing Body to hear the views of all those with an interest in the proposed changes.

### **Consultation Report**

3. In accordance with the requirements of the Welsh Government School Organisation Code the Governing Body published a consultation report. (A copy of the consultation report can be seen at Appendix 1).

### **Statutory Notice**

4. At its meeting on 14 June 2022 the Governing Body agreed the publication of a statutory notice to
  - Increase the designated number at The Marion Centre Specialist Resource Base from 42 to 66 places
5. A copy of the minutes from The Bishop of Llandaff Church in Wales High School Governing Body meeting on 14 June 2022 can be seen at Appendix 2.
6. It is proposed to implement the proposal from September 2022. The notice stated that the number of students within the base has already reached the proposed number of 66 places.
7. The statutory notice was published on 30 June 2022 for a period of 28 days to allow for objections. The statutory notice period expired on 27 July 2022. (A copy of the notice can be seen at Appendix 3).

8. The notice was published on the school website ([Consultation on Expansion of The Marion Centre - The Bishop of Llandaff CiW High School](#)), Cardiff Council website ([Additional Learning Needs \(ALN\) provision \(cardiff.gov.uk\)](#)) and posted at the entrances to the school.
9. Copies of the notice were distributed to students, parents, carers and guardian, governors and staff members. All other organisations and consultees required under the School Organisation Code 2018 were e-mailed a link to the published notice on the school website.
10. Where objections are received to the statutory notice, an objection report must be published summarising the statutory objections and the proposer's response to those objections.

### **Objections to the proposals**

11. The Governing Body received one objection by the statutory notice closing date.
12. A summary of the objection and the Governing Body's response can be seen below. The objector understood the need for The Marion Centre but strongly objected to the proposed increase in places with the following points raised in the objection
  - Taxis are currently queuing from Pwllmelin Road from about 2:15pm which causes difficulties for anyone accessing or trying to exit Rookwood Close;
  - Parking caused by the school has become a major issue and nothing is being done to improve the situation despite discussions with the school, the police and local councillors;
  - Students parking their cars on Rookwood Close has resulted in difficulties for emergency vehicles (ambulance) gaining necessary access/egress;
  - Parents collecting their children are causing problems from 2.30pm onwards which is made worse if it is raining; and
  - It is only a matter of time before someone dies due to access difficulties.

### **The Bishop of Llandaff Church in Wales High School response to the objections:**

13. The Council has provided the following advice to the Governing Body in respect of traffic and transport issues outside of the school site.
14. The Council applies three-mile statutory qualifying walking distance criteria for students to qualify for free home to school transport to secondary schools.
15. Some specialist resource base students who live within three miles of the school may be provided with free home to school transport due to their individual learning needs and/or social issues. Other students are able to travel independently or with parent/ carers and if resident within the three-mile qualifying distance may not be eligible for home to school transport. These

students as well as staff and school visitors would benefit from any required improvements in facilities for active travel to school or public transport facilities.

16. The Council's current Corporate Plan includes a commitment to every school in Cardiff developing an Active Travel Plan. Such a plan will identify actions by the school to support and encourage active travel to school and also any improvements to on-site and off-site infrastructure required to facilitate active journeys.
17. Increasing travel to school by active modes (walking, cycling and scooting) by ensuring safe facilities are provided will have a positive impact on children's health and wellbeing. A number of initiatives have successfully demonstrated support and encouragement for active and sustainable travel amongst the Additional Learning Needs cohort, which would be offered to students as appropriate, including Independent Travel Training for older students (to be reviewed each year), cycle maintenance and cycle training.
18. The Governing Body acknowledges the concerns raised in relation to increased traffic. The Governing Body notes that, as the Specialist Resource Base at the Marion Centre is already operating at the proposed designated number of 66 places, the proposals to formalise this increase in the designated number is not expected to require any additional school transport vehicles.
19. The school is working closely with Cardiff Council and a number of potential mitigation measures for existing congestion issues on Rookwood Close and Pwllmelin Road are being considered and include
  - Management of the school transport arrival times to avoid unduly long waiting periods;
  - A review of the access gate location and barrier arrangement;
  - A review of the design and layout of the drop-off and pick-up area;
  - A review of coach parking arrangements on Pwllmelin Road to improve visibility; and
  - Consideration of traffic restrictions including parking, loading and unauthorised access restrictions at specific times.

### **Determination of proposal**

20. Proposals published under section 48 of the School Standards and Organisation (Wales) Act require approval by the local authority if they have been made by a proposer other than the local authority and an objection to the proposals has been made and not been withdrawn in writing before the end of 28 days beginning with the end of the objection period.
21. Where proposals require approval by the local authority, the proposer must notify the local authority of a proposal requiring approval and forward to them the documents listed below within 35 days of the end of the objection period
  - A copy of the consultation document

- A copy of the consultation report;
- A copy of the published notice;
- A copy of the objection report;
- Copies of the statutory objections; and
- Copies of all the above in relation to any proposals which are related to the proposal requiring approval.

22. Local authorities must decide whether to approve, reject to approve with modifications, the proposals.

23. In line with these requirements the proposal has been referred to Cardiff Council for determination.

*The following appendices are attached:*

*Appendix 1 – Consultation Report*

*Appendix 2 - Minutes of The Bishop of Llandaff CiW High School Governing Body meeting on 14 June 2022*

*Appendix 3 – Statutory Notice*

# **The Governing Body of Whitchurch High School**

## **Consultation Report**

### **Proposal for Additional Specialist Resource Base places at Whitchurch High School**

#### **Reason for this Report**

1. The Governing Body of Whitchurch High School in partnership with Cardiff Council recently consulted on a proposal to:
  - Increase the designated number at Whitchurch High School Specialist Resource Base from 70 to 100 from September 2022.
2. In accordance with the requirements of the Welsh Government School Organisation Code the Governing Body must publish a consultation report
  - summarising each of the issues raised by consultees;
  - responding to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons; and
  - setting out Estyn's response to the consultation in full, responding to Estyn's response by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons.

#### **Consultation**

3. At its meeting on 24<sup>th</sup> February, 2022, the Governing Body agreed to hold a public consultation on proposals to:
  - increase the designated number at Whitchurch High School Specialist Resource Base from 70 to 100 from September 2022.
4. At its meeting on 14 October 2021, Cardiff Council Cabinet noted that a statutory consultation on the proposal was to be undertaken and authorised officers to provide all reasonable assistance.
5. The consultation on the proposed expansion of the Specialist Resource Base was undertaken jointly with proposals for secondary complex learning needs and autism spectrum condition Specialist Resource Base provision.
6. The consultation ran from 14 December 2021 to 01 February 2022 and was supported by Cardiff Council.
7. Parents and others in the local community, together with staff and Governors of other affected schools were invited to respond to the consultation.
8. The consultation process for all proposals involved:

- Publication of a bilingual consultation document outlining background, rationale and implications to parents, Headteachers and Chairs of Governors of Cardiff schools, staff, Members and other stakeholders; (a copy of the consultation document can be seen at Appendix 1);
  - Publication of a bilingual summary document setting out the main points of the consultation document; (a copy of the consultation document can be seen at Appendix 2);
  - Publication of information in community languages upon request;
  - Consultation meetings in person with pupil representatives; (notes from the meetings can be seen at Appendix 3);
  - A public consultation meeting via Microsoft Teams at which the proposal was explained by Council officers and questions answered; (notes from the meetings can be seen at Appendix 4);
  - Drop-in sessions via Microsoft Teams where council officers and representatives from the school were available to answer questions; (there were no requests);
  - Letters setting out details of the proposals and where further information could be found were sent to local residents and businesses in the area surrounding the school sites subject to the proposed changes;
  - A communication campaign via social media;
  - A consultation response slip for return by post or e-mail, attached to the consultation document;
  - An online response form on the Council's website [www.cardiff.gov.uk](http://www.cardiff.gov.uk)
9. For stakeholders who did not have access to digital platforms the opportunity to discuss the proposed changes via telephone was available.
10. The views expressed at Council organised meetings, drop-in sessions, telephone calls, and on paper or electronically through the appropriate channels, have been recorded.
11. Views were sought from interested stakeholders via an online survey and a hard copy version of the survey within the consultation document.
12. The details presented in this report, represent the views expressed during the consultation process. These include the wider stakeholder survey, formal responses, e-mail responses, views expressed at public meetings, drop-in sessions, telephone calls and the pupil consultation survey.
13. The views expressed in the wider stakeholder surveys reflect those raised in the e-mail responses received.

### **Responses received during the consultation period**

14. As set out at paragraph 5 the consultation on the proposed expansion of the Specialist Resource Base was undertaken jointly with proposals for secondary complex learning needs and autism spectrum condition Specialist Resource Base provision. The consultation included proposals for the establishment/expansion of additional learning needs provision at five secondary schools across Cardiff.

15. In total 114 responses to the consultation on the proposals for secondary complex learning needs and autism spectrum condition Specialist Resource Base provision were received by the Council including 106 online responses and a further 8 e-mail responses regarding the specific proposals consulted on.
16. The Council received a number of formal responses to the strategic expansion of ALN provision which did not reference Whitchurch High School including a response from Estyn details of which can be found at [Cabinet 10 March 2022 SOP Complex learning needs App 6.pdf \(moderngov.co.uk\)](#)
17. Of the 106 online responses received, 89 respondents replied to the proposal to increase the designated number at the Specialist Resource Base for learners with complex learning needs from 70 to 100 from September 2022. Twenty respondents identified as a parent of a child at the school.
18. Of the 89 online responses almost nine in ten (87.6%) of respondents agreed with the proposal. If 'Don't know' responses are removed from the analysis, then agreement rises to 94.9%.
19. A summary analysis of the responses received can be seen at Appendix 5.
20. The points raised during the consultation are set out in *italics* below and have been grouped according to the issues raised where appropriate.
21. The Governing Body's response to each point can be seen underneath, under the heading "Appraisal of Views Expressed".

### **Formal Responses**

22. Formal responses to the consultation for secondary complex learning needs and autism spectrum condition Specialist Resource Base provision were received from:
  - Estyn.
23. The response from Estyn covered all of the secondary complex learning needs and autism spectrum condition proposals consulted on and was not specific to the expansion of the Specialist Resource Base at Whitchurch High School.
24. Estyn welcomed the proposals which sits alongside others and aims to achieve a more equitable provision to better match current and future learning needs of pupils, across the City.
25. The response from Estyn sets out its view that the proposals are likely to, at least, maintain the standard of education provision in the area.

26. Their response included the following points (for the full response, please see Appendix 6):

- *We welcome this proposal which sits alongside others and aim to achieve a more equitable provision to better meet the current and future additional learning needs of pupils, across the City.*
- *We consider that the proposal is likely to, at least, maintain the standard of education provision in the area.*
- *The proposals outline very clearly five broad principles that all schools and settings should aspire to and attain in effectively supporting pupils with additional learning needs... It is not clear however, if there is an overall framework that will help to ensure the realisation of the principles. An overall framework could be used also to guide and assist schools that are either establishing or developing specialist resource base provision. Neither is it clear what support or networks exist, or will be created, to support leaders and staff as they develop and embed effective practices in meeting the needs of pupils.*
- *The proposer states that a joint review of health and specialist provision in Cardiff special schools and the pupil referral units is being carried out. However, it is not clear if the scope and outcomes of the review will benefit pupils in specialist resource bases across the city. Neither is it clear if the review will look at Welsh medium provision alongside English medium provision.*
- *The proposal gives appropriate attention to the current capacity and how it is unable to meet the demands for places for pupils with complex learning needs and autism spectrum condition and the deficit of places currently available.*
- *The proposer defines specialist resource bases as “a small class in a mainstream school for pupils with significant additional learning needs. All pupils attending a specialist resource base have a statement of SEN and are taught by specialist teachers and learning support assistants, and have opportunities to learn, play or socialise with other mainstream pupils...” It is unclear from the definition whether pupils, where appropriate, can access, with appropriate support where necessary, lessons alongside pupils that do not attend the specialist resource base. To comply with the Additional Learning Needs and Education Tribunal [Wales] Act the proposer needs to consider the admission of pupils with individual development plans.*
- *The proposal appears to provide effective opportunities for stakeholders, organisations, and members of the public to respond. This includes opportunities to access online public meetings. The*



*process is clearly set out with timescales and how the consultation will be used.*

- *Statements made by the proposer for all schools about for example, teaching and learning experience and care, support and guidance are identical and do not provide a good enough account of how these are tailored to meet the specific additional learning needs of the pupils.*
- *The proposal considers suitable alternatives, for all schools, and outlines the possible benefits and disadvantages appropriately.*
- *The proposals consider appropriately the travel implications for pupils. All proposals foresee the likelihood of reducing travel time from home to school for some pupils. They also identify the need to further assess the suitability of drop-off and pick up point at each school site.*
- *The overall proposal considers the provision for the Welsh language but does not reflect the ambition laid out in the local authority's draft Welsh in Education Strategic Plan 2022-2032. The plan states that the authority aims to increase the number of secondary specialist places to be delivered in an SRB located at each Welsh-medium high school with different specialist needs in each base to achieve a level of specialist provision that is on a par with other sectors and responds appropriately to individual need. This proposal does not address this particular aim sufficiently well.*
- *The proposer states that there is an opportunity to employ specialist staff and to work more closely with specialist services in Cardiff. However, no further detail is provided and there is no guarantee that the opportunity will translate into a firm commitment or reality. The proposer further states that the pool of Welsh speaking ALN qualified and experienced teaching staff is limited in number, in comparison to the English sector. It goes on to state that any plan to develop Welsh medium specialist provision will need to be supported by an Additional Learning Needs Workforce Development Plan but lacks any detail or commitment about how this will come about.*
- *The proposer correctly asserts that pupils with additional learning needs may find change difficult. Other than recognising that change needs to be carefully planned, information on transition planning is very limited.*

### **Appraisal of views expressed**

27. The Governing Body acknowledges the conclusions of Estyn on the overall merits of the proposals.

28. The broad principles outlined in the consultation document reflect the approach the Council takes when developing Additional Learning Needs provision.
29. The Council provides a range of support to specialist settings including specialist staff, CPD support for staff to development, ALNCO forums, cluster ALNCO meetings, termly additional learning needs updates for Headteachers and regular updates for governing bodies.
30. The Council is currently working with the Health Board to review services. This review will include consideration of specialist resource base provision in addition to special school provision
31. Pupils attending specialist resource base provision benefit from specialist curriculum which is tailored to meet their needs. However, where appropriate pupils access mainstream provision.
32. In line with the requirements of the Additional Learning Needs and Education Tribunal [Wales] Act, the transition to individual development plans is being progressed.
33. The planning of Welsh-medium specialist places city is not the responsibility of the Governing Body of Whitchurch High School.
34. The school continues to work with the Council to identify appropriate transition arrangements for pupils with additional learning needs. These arrangements are dependent on individual need and are progressed as required. This support includes the provision/timing of funding, support with the recruitment and training of staff, the identification of needs and ongoing reviews.

### **Pupil consultation**

35. Council officers met with Student Voice (Mainstream) pupils and a group of Y13 Pupils who attend the SRB at Whitchurch High to discuss their views on the proposed changes.
36. Amongst the mainstream pupils some learners felt that it would be fine to expand, as it's only a small number of additional pupils, and if these pupils needed a space at an SRB they should be able to take a space up. However, more classrooms may be needed.
37. There was a concern expressed about accessibility for learners who use a wheelchair as some of the corridors are narrow.
38. Some learners felt that there wasn't enough room for further SRB pupils or any more classrooms. One learner said that the SRB pupils take up a lot of tables at lunchtime in the canteen which doesn't leave enough space for other pupils (staggered lunchtimes, SRB have lunch earlier).
39. It was felt by some pupils that there needed to be more staff for the SRB if there were more pupils, who would understand their needs. It was added that there can be some difficulties with mixing when mainstream pupils

don't realise that pupils are from the SRB and may not make allowances for their behaviour in shared spaces. It was suggested that a tutorial lesson could be given over for mainstream pupils to learn more about the type of needs the pupils in the SRB have, so that they can understand them better.

40. Some of the pupils expressed concern that if the designated number was 70 and there are 96 pupils at the SRB, what is to stop the number going higher than 100? Some of the pupils were in favour of admitting more pupils, and others felt the number should stay at 70.
41. There was concern that if additional classrooms were needed that there was not sufficient space for them on the Upper School site. There was a suggestion that some existing classroom space could be freed up by dropping some of the less popular GCSE subjects.
42. There was a suggestion to put the SRB all on one site.
43. The Specialist Resource Base pupils felt that there would be enough space in the base to admit 4 more pupils, as long as there are not large Y10 and Y11 classes, as then more classroom space would also be needed. They mentioned that if there are large numbers within a year group, the group is split into two, and changes in classes can be difficult for pupils who feel anxious about meeting new people, although some pupils don't mind.
44. In terms of staffing, the pupils were not concerned, unless there is a large increase in the number of pupils.
45. In relation to outside space, the Specialist Resource Base used to have access to an Astroturf to play football and a sensory garden, but they can no longer access either of these as the space has been taken up with a new building. They now only have a small outside place and pupils agreed that they would like more outside space.
46. They also said that they would like to use the gym but that there isn't sufficient space for them to use it.

### **Appraisal of views expressed**

47. The Governing Body will work with the Council to improve and refurbish existing accommodation, creating additional classrooms and learning spaces. Some of this work has already been undertaken in order that the school, and Cardiff Council, can ensure sufficient places were available for children with complex learning needs.
48. The Governing Body will work with the Senior Leadership Team to consider how school facilities and outside spaces can be best used to meet the needs of all pupils.
49. The Governing Body will continue to work with the Council HR People Services to address the HR implications arising from the permanent increase in the designated number at Special Resource Base at the school and the resulting need for additional staffing.

50. The Governing Body will work with the Senior Leadership Team to bring forward activities to allow the development of a better understanding of the Specialist Resource Base provision across the wider school community.

### **Other responses received**

51. Reasons for supporting the proposed changes included:

- *Recognition of the need for increased additional learning need provision*

52. Whilst there was support for the expansion of specialist resource base provision at the school there were a number of concerns related to:

- *The need for investment in facilities/learning environment*
- *The need to train more specialist teacher and support staff*

### **Appraisal of views expressed**

53. Issues related to facilities/learning environment are addressed at paragraphs 47 – 48.

54. Issues related to staffing are addressed at paragraph 49.

### **Quality and Standards in Education**

55. The school continues to work closely with the Council to make sure that standards are high, that teaching is good, and that leadership and governance is strong.

56. Standards at the school are good. Increasing the Specialist Resource Base provision would provide appropriate high quality school places for young people with complex learning needs.

57. It is not expected that the proposal will impact on standards at the school. The proposal is not expected to have any negative impact on the quality of standards of education at the school as a result of the proposed changes.

58. The proposal is not expected to have any negative impact on teaching and learning experiences at the school. The school has an appropriate range of policies and provision in place to promote pupils' health and wellbeing. The school is committed to providing an environment in which learning is valued and pupils achieve their potential in a happy, safe environment in which they show respect and tolerance for each other.

59. The school continues to work to make sure everyone understands their responsibility for helping to improve and sustain high performance. The school has good relationship with parents and other partners and pupils receive a high-quality education.

60. The proposed changes would be planned carefully so that leadership and governance is not disrupted, which could have a negative impact on educational standards.

### **Transport Matters**

61. The Council applies the two-mile statutory qualifying walking distance criteria for pupils to qualify for free home to school transport to specialist resource bases. Some specialist resource base learners who live within two miles of the school may be provided with free transport due to their individual learning needs and social issues. Other learners are able to travel independently or with parent/carers and if resident within the two-mile qualifying distance may not be eligible for Learner Transport. These pupils as well as staff and school visitors would benefit from any required improvements in facilities for active travel to school or public transport facilities.
62. The Council's current Corporate Plan includes a commitment to every school in Cardiff developing an Active Travel Plan. Such a plan will identify actions by the school to support and encourage active travel to school and also any improvements to on-site and off-site infrastructure required to facilitate active journeys.
63. Increasing travel to school by active modes (walking, cycling and scooting) by ensuring safe facilities are provided will have a positive impact on children's health and wellbeing. A number of initiatives have successfully demonstrated support and encouragement for active and sustainable travel amongst the Additional Learning Needs cohort, which would be offered to learners as appropriate, including Independent Travel Training for older pupils (to be reviewed each year), cycle maintenance and cycle training.
64. With the expected increased demand for Learner Transport suitable improved and / or expanded facilities for drop-off and pick-up may be required within the site to accommodate the appropriate numbers of vehicles. Other improvements may include modifications to the layout, signing and traffic control measures.

### **Community Impact**

65. The Council has considered the impact on the wider community and has concluded that the proposal would have any wider impact.

### **Admission Arrangements**

66. Admissions to specialist provision are managed by the Council, subject to a statement of Special Education Needs (SEN). Under the ALN Code, placement will be subject to an Individual Development Plan (IDP).
67. There are no planned changes to the Council's policy on the admission of children to schools as a result of this proposal.

68. Detailed information about admission arrangements is in the Council's Admission to School booklet. This information can be found on the Council's website at [www.cardiff.gov.uk](http://www.cardiff.gov.uk).
69. There are no planned changes to the school's policy on the admission of children to the school as a result of this proposal.

## **RECOMMENDATIONS**

1. The Governing Body is recommended to publish proposals in accordance with section 48 of The School Standards and Organisation (Wales) Act 2013 on proposals to:
  - increase the designated number at Whitchurch High School Specialist Resource Base from 70 to 100 from September 2022.
2. Note that in the event of there being no objections to the published proposals a further report will be considered by the Governing Body prior to implementation of the proposal.
3. Note that in the event of objections to the published proposal being received, the proposal would be referred to the Local Authority (Cardiff Council) for determination within 35 days of the end of the objection period. The Local Authority has 16 weeks from the end of the objection period to determine the proposals.

*The following appendices are attached:*

- Appendix 1 – Consultation Document
- Appendix 2 – Summary Document
- Appendix 3 – Notes of pupil meetings
- Appendix 4 – Notes of public meetings
- Appendix 5 – Summary analysis of responses
- Appendix 6 – Estyn Response to the consultation

## WHITCHURCH HIGH SCHOOL

### SCHOOL STANDARDS AND ORGANISATION (WALES) ACT 2013

#### ADDITIONAL LEARNING NEEDS PROVISION

**NOTICE IS HEREBY GIVEN** in accordance with Section 42 of the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code, that the Governing Body of Whitchurch High School (herein after “the Governing Body”), having consulted such persons as appeared to them to be appropriate, propose to alter Whitchurch High School, Penlline Road, Whitchurch, Cardiff, CF14 2XJ to:

- Increase the designated number at the Specialist Resource Base for learners with complex learning needs from 70 to 100 places.

It is proposed to implement the proposal from September 2022.

The school is a Foundation school and is currently maintained by Cardiff Council.

A public consultation was undertaken on behalf of the Governing Body before deciding to publish this proposal. A consultation report containing a summary of the issues raised by consultees and the Governing Body’s responses and the views of Estyn on the proposed changes is available to view at:

[www.whitchurchhs.wales](http://www.whitchurchhs.wales)

The current school capacity is 2400 places including sixth form. The current number of pupils at the school is 1984 (11 - 16) and 427 (Sixth form).

There are currently 70 places at the Specialist Resource Base. The current number of pupils at the resource base is 95.

There are no plans to change the school policy on the admission of children to school as a result of these proposals.

Admissions to the Specialist Resource Base are managed by the local authority and subject to a statement of Special Educational Needs (SEN) or Individual Development Plan (IDP) as appropriate.

Admissions to the Specialist Resource Base will continue to be separate to admission to the main school and shall be in addition to the Published Admission Number (PAN).

Any arrangements for the transport of pupils will be made in accordance with the Local Authority’s existing policies on school transport.

Within a period of 28 days of the date of publication of these proposals, that is to say by 27<sup>th</sup> July 2022, any person may object to these proposals.

Objections should be sent to the Chair of Governors, Whitchurch High School, Penlline Road, Whitchurch, Cardiff, CF14 2XJ.

Objections may also be sent to the Chair of Governors using the following e-mail address: [SchoolResponses@cardiff.gov.uk](mailto:SchoolResponses@cardiff.gov.uk)

Please note that any such objection should contain the full name and postal address of the objector.

The Governing Body will publish a summary of any such objections made within the objection period (and not withdrawn in writing), together with its response, within the period of 28 days after the end of the objection period.

Dated this 30th day of June 2022

Signed: Sian Hopkins  
Chair of Governors

### **EXPLANATORY NOTE**

(This does not form part of the Notice but is intended to explain its general meanings)

Whitchurch High School is an English-medium Foundation school located in Whitchurch.

The school hosts a specialist resource base, designated for Complex Learning Needs.

To meet the demand for Specialist Resource Base places for learners aged 11 - 19 with Complex Learning Needs it is proposed to increase the designated number at the Specialist Resource Base from 70 to 100 places from September 2022.

The number of pupils at the base is 95.

It is proposed that the current specialist resource base accommodation would be improved and refurbished, creating additional classrooms and learning spaces. Some of this work has already been undertaken in order that the school, and the Council, can ensure sufficient places were available for children with complex learning needs.

In addition to the proposed increase in designated places at the specialist resource base, further places for pupils with complex learning needs and autism spectrum condition have been proposed for a number of schools within the local authority.

Details of these proposals and copies of the statutory notices can be seen at [Additional Learning Needs \(ALN\) provision \(cardiff.gov.uk\)](#)



Confidential Appendix 11: Summary Financial Modelling - placements costs

**FINANCIAL IMPACT OF EXTRA PLACES**

		Extra Budget Requirement - Marlborough SRB, Springwood SRB, Meadowbank Special School and The Marion Centre						
		2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	Total
<b>Marlborough SRB</b>		0	0	0	0	0	0	0
<b>Springwood SRB</b>		0	0	0	0	0	0	0
<b>Meadowbank Special School</b>		282,000	352,000	146,000	0	0	0	780,000
<b>The Marion Centre SRB</b>		0	0	0	0	0	0	0
		<b>282,000</b>	<b>352,000</b>	<b>146,000</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>780,000</b>

		Extra Budget Requirement - Complex Learning Needs & Autism Spectrum Condition and Emotional Health & Wellbeing proposals, July 2022 and September 2022 determination						
		2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	Total
<b>Special Schools</b>		670,200	741,000	307,800	490,000	350,000	0	2,559,000
<b>Primary SRB</b>		262,500	362,500	125,000	0	0	0	750,000
<b>Secondary SRB</b>		301,850	488,000	371,000	183,000	108,000	45,000	1,496,850
		<b>1,234,550</b>	<b>1,591,500</b>	<b>803,800</b>	<b>673,000</b>	<b>458,000</b>	<b>45,000</b>	<b>4,805,850</b>

Mae'r dudalen hon yn wag yn fwriadol

Appendix 12: Summary Financial Modelling – transport costs

School / Education Setting	Transport cost of places added in 2022/23	Transport cost of places added in 2023/24	Transport cost of places added in 2024/25	Transport cost of places added in 2025/26	Transport cost of places added in 2026/27
Marlborough PS SRB					
Springwood PS SRB					
Meadowbank Special School	£91,275	£78,091	£81,995		
The Marion Centre SRB					
Llanishen Fach PS SRB		£66,784			
Moorland Primary SRB		£66,924	£70,270		
Pentrebane PS SRB					
The Hollies Special School	£56,200	£56,200	£59,010		
Llanishen HS SRB					
Willows HS SRB		£26,756	£28,094		
Ysgol Glantaf SRB		£9,748	£10,235	£10,542	£10,858
Ty Gwyn Special School	£126,084	£115,577	£121,356		
Cardiff West					
Eastern HS		£35,112	£36,868		
The Court				£149,810	£154,305
Whitchurch HS SRB	£24,888				
Single year place / budget adjustment	£298,447	£455,193	£407,829	£160,352	£165,163

Mae'r dudalen hon yn wag yn fwriadol

Equality Impact Assessment  
Corporate Assessment Template



<b>Policy/Strategy/Project/Procedure/Service/Function Title: School Organisation Planning: Provision for children and young people with Additional Learning Needs (ALN)</b>
<b>New/Existing/Updating/Amending: Post statutory notice</b>

<b>Who is responsible for developing and implementing the Policy/Strategy/Project/Procedure/Service/Function?</b>	
Name: Richard Portas	Job Title: Programme Director
Service Team: Schools Programme	Service Area: Education
Assessment Date: August 2022	

**1. What are the objectives of the Policy/Strategy/Project/ Procedure/ Service/Function?**

<p>1. To inform the Cabinet of any objections received to the published statutory notices to:</p> <ul style="list-style-type: none"> <li>• Increase the designated number of Meadowbank Special School from 40 to 98 from September 2022.</li> <li>• Increase the designated number of the Specialist Resource Base for children with severe and complex learning needs at Marlborough Primary School from 20 to 30 places from September 2022.</li> <li>• Increase the designated number of the Specialist Resource Base for children with Autism Spectrum Condition at Springwood Primary School from 20 to 28 places from September 2022.</li> </ul> <p>2. To enable the Cabinet to consider the proposal by the Governing Body of the Bishop of Llandaff Church in Wales (CiW) High School to:</p> <ul style="list-style-type: none"> <li>• Increase the designated number at The Marion Centre Specialist Resource Base from 42 to 66 places from September 2022.</li> </ul>
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**2. Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]**

At its meeting on 10 March 2022 the Cabinet in accordance with the terms of the Schools Standards and Organisation (Wales) Act, approved a

## CARDIFF COUNCIL

### Equality Impact Assessment Corporate Assessment Template

recommendation for the publication of statutory notices relating to Meadowbank Special School, Marlborough Primary School and Springwood Primary School as set out in section 1.

The statutory notices were published on 08 June 2022 for a period of 28 days to allow for objections. The statutory notice period expired on 05 July 2022.

The notices were published on the Council's website, and hard copies were posted at the relevant school sites.

Copies of the notices were distributed via e-mail to organisations and consultees required under the School Organisation Code 2018.

Residents and businesses in the areas local to each school were notified of publication of the statutory notices by letter.

There were no objections to the proposed changes.

At its meeting on 14 June 2022, The Bishop of Llandaff CiW High School Governing Body agreed the publication of a statutory notice as set out in Section 1.

The statutory notice was published on 30 June 2022 for a period of 28 days to allow for objections. The statutory notice period expired on 27 July 2022. A copy of the notice can be seen at Appendix 6.

The notice was published on The Bishop of Llandaff CiW High School website, on the Council's website, and hard copies were posted at the relevant school sites.

Copies of the notice were distributed via e-mail to organisations and consultees required under the School Organisation Code 2018.

Residents and businesses in the local areas to each school were notified of publication of the statutory notices by letter.

The Governing Body received one objection by the statutory notice closing date.

An objection report setting out details of the objection and the Governing Body's response was published by The Bishop of Llandaff CiW High School Governing Body on 23 August 2022. A copy of the Objection Report can be seen at Appendix 7.

### **3 Assess Impact on the Protected Characteristics**

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**3.1 Age**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative/]** on younger/older people?

	Yes	No	N/A
Up to 18 years	X		
18 - 65 years			X
Over 65 years			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The impact will be positive as the proposals will support the sufficiency of places in suitable specialist learning environments.

This provision is age dependent and therefore not accessible to pupils outside of this age range, or adults, either locally or in the wider community.

The Council would manage admissions to special school and specialist resource base provision in accordance with the ALN Code.

**What action(s) can you take to address the differential impact?**

If the proposals were to proceed, an equality impact assessment would be carried out to identify the accessibility of any new accommodation. The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design 2014 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.

The Council's procedure for managing staffing changes arising from the proposal would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

**3.2 Disability**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment			
Physical Impairment			
Visual Impairment			
Learning Disability	X		
Long-Standing Illness or Health Condition			

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Mental Health			
Substance Misuse			
Other			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The impact will be positive as the proposals will support the sufficiency of places in suitable specialist learning environments.

The Council would manage admissions to special school and specialist resource base provision in accordance with the ALN Code.

**What action(s) can you take to address the differential impact?**

If the proposals were to proceed, an equality impact assessment would be carried out to identify the accessibility of any new accommodation new school building. The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design 2014 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.

The Council's procedure for managing staffing changes arising from the proposal would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

**3.3 Gender Reassignment**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
<b>Transgender People</b> (People who are proposing to undergo, are undergoing, or have undergone a process [or part of a process] to reassign their sex by changing physiological or other attributes of sex)		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The proposed changes would not have a differential impact as the schools and specialist resources bases will continue to apply the Council's / School policies on equal opportunities.

The Council would manage admissions to special school and specialist resource base provision in accordance with the ALN Code.



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### What action(s) can you take to address the differential impact?

The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

### 3.4. Marriage and Civil Partnership

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on marriage and civil partnership?

	Yes	No	N/A
Marriage			X
Civil Partnership			X

### Please give details/consequences of the differential impact, and provide supporting evidence, if any.

The proposed changes would not have a differential impact as the schools and specialist resource bases will continue to apply the Council's / School policies on equal opportunities.

### What action(s) can you take to address the differential impact?

The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

### 3.5 Pregnancy and Maternity

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy			X
Maternity			X

### Please give details/consequences of the differential impact, and provide supporting evidence, if any.

The proposed changes would not have a differential impact as the schools and specialists resource bases will continue to apply the Council's / School policies on equal opportunities.

### What action(s) can you take to address the differential impact?

The Council's procedure for managing staffing changes arising from

## CARDIFF COUNCIL

### Equality Impact Assessment Corporate Assessment Template

reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

#### 3.6 Race

Will this Policy/Strategy/Project//Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White			X
Mixed / Multiple Ethnic Groups			X
Asian / Asian British			X
Black / African / Caribbean / Black British			X
Other Ethnic Groups			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The proposed changes would not have a differential impact as the schools and specialist resource bases will continue to apply the Council's / School policies on equal opportunities.

The Council would manage admissions to special school and specialist resource base provision in accordance with the ALN Code.

**What action(s) can you take to address the differential impact?**

The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

#### 3.7 Religion, Belief or Non-Belief

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist			X
Christian			X
Hindu			X
Humanist			X
Jewish			X
Muslim			X
Sikh			X

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Other			X
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**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The proposed changes would not have a differential impact as the schools and specialist resource bases will continue to apply the Council's / School policies on equal opportunities.

The Council would manage admissions to special school and specialist resource base provision in accordance with the ALN Code.

**What action(s) can you take to address the differential impact?**

The senior staff in a school would be best placed to manage diversity in terms of belief. (e.g. provision of a space for prayer).

**3.8 Sex**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on men and/or women?

	Yes	No	N/A
Men		X	
Women		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The proposed changes would not have a differential impact as the schools and special resources bases will continue to apply the Council's / School policies on equal opportunities.

The Council would manage admissions to special school and specialist resource base provision in accordance with the ALN Code.

**What action(s) can you take to address the differential impact?**

Maintained school provision admits pupils of both sexes and this would continue to be the case.

The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

**3.9 Sexual Orientation**

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Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
Bisexual		X	
Gay Men		X	
Gay Women/Lesbians		X	
Heterosexual/Straight		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The proposed changes would not have a differential impact as the schools and special resource bases will continue to apply the Council's / School policies on equal opportunities.

The Council would manage admissions to special school and specialist resource base provision in accordance with the ALN Code.

**What action(s) can you take to address the differential impact?**

Evidence collated by the Stonewall lobby group alleges that Lesbian, Gay, Bisexual people are likely to be discriminated against in workplace recruitment.

The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

**3.10 Socio-economic Duty**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the Socio-economic Duty?

	Yes	No	N/A

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The proposed changes are expected to have a positive impact on the Socio-economic Duty. The Council's has made a clear commitment to continuing the investment in, and improvement of, Cardiff schools to make sure every child has the best possible start in life ([www.cardiffcommitment.co.uk](http://www.cardiffcommitment.co.uk)).

The delivery of additional ALN places will ensure that there are appropriate, high quality school places for young people, which meet the needs of Cardiff's

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growing and changing population.

The Council works closely with the governing bodies of schools to ensure that standards in schools are high, that teaching is good, and that leadership and governance is strong.

The Council does not expect the proposal to have any negative impact on the quality of standards of education for pupils, at these schools.

Some of the funding that a school receives is based on the number of pupils in the school who receive Free School Meals. All schools in Cardiff would receive funding for these pupils. There is no information available that suggests that the proposals would have a negative effect on pupils who receive Free School Meals.

**What action(s) can you take to address the differential impact?**

N/A

**3.11 Welsh Language**

Will this Policy/ Strategy/Project/Procedure/Service/Function have a **differential impact (positive/negative)** on the Welsh Language?

	Yes	No	N/A

**Please give details/ consequences of the differential impact, and provide supporting evidence, if any.**

The Council is committed to developing a Bilingual Cardiff.

Cardiff's Welsh in Education Strategic Plan (WESP) 2022-2031 sets out a series of ambitious commitments to build on the progress achieved to date. These will ensure that every child in the city can receive an education in the language of Welsh, the number receiving their education in Welsh-medium schools will increase, and through the significant use of Welsh in English medium education all will have the opportunity to become confident in speaking Welsh.

The level of special educational needs/ additional learning needs in the Welsh-medium sector has historically been lower than in the English medium sector. This has however been changing over the last 4-5 years, with schools reporting an increased incidence of additional learning needs, in all areas of need.

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### Equality Impact Assessment Corporate Assessment Template

A review of additional learning needs in the Welsh-medium sector was undertaken with Welsh medium schools in 2016 to inform the Welsh in Education Strategic Plan (WESP). Schools reported a small but significant number of examples of pupils with additional learning needs leaving the Welsh-medium sector in order to access Specialist Resource Bases or special schools.

There was also some anecdotal evidence to suggest that some families who would otherwise choose Welsh-medium education opt instead for English medium if their child has additional learning needs, through concern that their child may need to transfer to the specialist sector at a later date.

Through the WESP, Cardiff has invested in specialist provision in the sector, including some capacity to respond to growing demand and to generate more confidence in the availability of specialist provision in the sector.

A new primary base was established at Ysgol Gymraeg Pwll Coch, within the catchment area of Ysgol Gyfun Gymraeg Glantaf, where the secondary base is established. The two bases cater for learners with severe learning difficulties, providing a specialist curriculum and supporting a range of secondary needs including physical and medical needs, speech and language difficulties and autism.

As the Welsh sector continues to grow it will be important to develop additional provision in anticipation of the need, to ensure Welsh-medium education is a genuine choice for learners with complex additional learning needs.

Following engagement sessions with members of Cardiff's Welsh Education Forum in summer 2021, the Council formally consulted on its draft Welsh in Education Strategic Plan (WESP) 2022-2032 between 15 October 2021 and 13 December 2021.

Links to the plan (including the full draft WESP, the easy read summary version and the Trajectory for Growth) and survey webpage were circulated to statutory stakeholders including Cardiff schools and Cardiff's Welsh Education Forum member organisations.

The draft WESP sets out the strategy for the development of Welsh-medium additional learning needs provision and proposals would be brought forward as part of the implementation of the Council's Welsh in Education Strategic Plan following agreement of the strategy by the Welsh Government and formal adoption by the Council later in 2022.

The Cabinet approved Cardiff's WESP 2022-2031 at its meeting of 24 February 2022, for submission to the Welsh Government Ministers.

The ongoing development of additional learning needs provision including new

**CARDIFF COUNCIL**

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and existing provision will be kept under review to ensure proposals are brought forward in a strategic and holistic way that takes into account the needs of all of our learners and reflects the additionality required to ensure parity in the Welsh-medium sector as new places are delivered throughout the proposed WESP.

**What action(s) can you take to address the differential impact?**

Demand for WM ALN places will be kept under review and proposals brought forward in line with the Welsh in Education Strategic Plan

**4. Consultation and Engagement**

What arrangements have been made to consult/engage with the various Equalities Groups?

The Council's Accessibility Officer would be given the opportunity to comment on the schemes.

**5. Summary of Actions [Listed in the Sections above]**

<b>Groups</b>	<b>Actions</b>
Age	See Generic Over Arching below
Disability	
Gender Reassignment	
Marriage & Civil Partnership	
Pregnancy & Maternity	
Race	
Religion/Belief	
Sex	
Sexual Orientation	
Socio-economic Duty	
Welsh Language	
Generic Over-Arching [applicable to all the above groups]	<p>If the proposals were to proceed:</p> <ul style="list-style-type: none"> <li>• compliance with the Council's policies on equal opportunities would need to be ensured.</li> <li>• an equality impact assessment would be carried out to identify the accessibility of any new school building. The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design 2014 as well as building regulations such as, BS8300, Part M and relevant</li> </ul>

## CARDIFF COUNCIL

### Equality Impact Assessment Corporate Assessment Template

	<p>Building Bulletins.</p> <ul style="list-style-type: none"><li>• Demand for WM ALN places will be kept under review and proposals brought forward in line with the Welsh in Education Strategic Plan</li></ul>
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#### 6. Further Action

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

#### 7. Authorisation

The Template should be completed by the Lead Officer of the identified Policy/Strategy/Project/Function and approved by the appropriate Manager in each Service Area.

Completed By : Ceri Tanti	Date: August 2022
Designation: School Organisation Project Officer	
Approved By:	
Designation:	
Service Area: Education	

- 7.1 On completion of this Assessment, please ensure that the Form is posted on your Directorate's Page on CIS - *Council Wide/Management Systems/Equality Impact Assessments* - so that there is a record of all assessments undertaken in the Council.

For further information or assistance, please contact the Citizen Focus Team on 029 2087 2536 / 3262 or email [equalityteam@cardiff.gov.uk](mailto:equalityteam@cardiff.gov.uk)



**CABINET MEETING: 28 SEPTEMBER 2022**

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**CARDIFF COUNCIL ANNUAL COMPLAINTS REPORT 2021 - 22****FINANCE, MODERNISATION AND PERFORMANCE  
(COUNCILLOR CHRIS WEAVER)****AGENDA ITEM: 7**

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**Reason for this Report**

1. To report to the Cabinet on the operation of the corporate complaints procedure between 1st April 2021 and 31st March 2022. The statistics for corporate complaints are set out by service area.

**Background**

2. Complaints provide valuable information about how we are performing and what our customers think about our services. Most people who complain tell us what we have done wrong and how we can do better; we use this information to improve our services, strengthen our relationships with customers and make better use of our resources. Publishing this annual report demonstrates the Council's commitment to transparency and a positive approach to dealing with and learning from complaints.
3. The Council's complaints procedure reflects guidance given in the Welsh Government Model Policy and Guidance Paper for Handling Complaints. This was further supported by the Public Services Ombudsman for Wales. Complaints Managers record information about the number of complaints they have received and how quickly they acknowledged and responded to the complaints. This information is submitted to the Corporate Complaints Team at the end of each quarter. The Corporate Complaints Team use this information to ensure that the complaints policy is being adhered to. Meanwhile, the Public Services Ombudsman for Wales captures detailed information regarding complaints against the Council which is included in his annual report.

**Complaints**

4. A total of 3,633 (Corporate) complaints were recorded during 2021/22. This is an 43.2% increase from the previous year, when 2,537 complaints were recorded.

## **Compliments**

5. As an organization, we receive many positive comments about our staff and the services we provide. Knowing where things are working well and are appreciated is as important to capture as knowing where things are perhaps not working. We therefore keep a record of the compliments we receive as well as the complaints. Good practice and learning can then be circulated across the Council.
6. A total of 1,487 compliments were recorded during 2021/22. This is an 22.2% decrease from the previous year, when 1,912 compliments were recorded.

## **Ombudsman Complaints**

7. Recommendations in Ombudsman reports and observations about our strengths and weaknesses help us improve our processes. The Ombudsman closed 159 cases involving Cardiff Council in 2021/22 compared to 100 cases in 2020/21. In her annual letter to the Council, the Ombudsman has remarked that it is likely that complaints about “public services in general, were suppressed during the pandemic, and we are now starting to see the expected ‘rebound’ effect”.
8. Of the 159 cases closed by the Ombudsman, 40 were referred back to the Council as premature (defined as when the council has not had a reasonable opportunity to deal with the complaint itself). 50 cases were closed by the Ombudsman after initial consideration and with no further action required by the Council (no evidence of maladministration or service failure). A further 39 cases were declined because the Ombudsman was satisfied with action proposed or taken by the Council to settle the complaint and 24 cases were out of the Ombudsman’s jurisdiction. Of the 159 cases involving Cardiff Council, just 6 were accepted for further investigation by the Ombudsman during 2021/22.

## **Reason for Recommendations**

9. To enable Cabinet to have corporate overview of the complaints and compliments process during 2021/22 and to note the information contained within the report.

## **Financial Implications**

10. This report has no direct financial implications. Any financial implications of future changes made to improve processes and learn from complaints will need to be met from existing resources.

## **Legal Implications**

11. There are no direct legal implications arising from this report.

### **HR Implications**

12. There are no HR implications arising from this report.

### **Property Implications**

13. There are no property implications arising from this report.

### **RECOMMENDATIONS**

Cabinet is recommended to note the contents of the report.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Isabelle Bignall Chief Digital Officer</b>
	22 September 2022

*The following appendix is attached:*

Appendix A –Cardiff Council Annual Complaints & Compliments Report 2021-22

Mae'r dudalen hon yn wag yn fwriadol

# **Cardiff Council**

## **Annual Complaints & Compliments Report 2021/22**

## 1. Reason for this report

To report to the Cabinet on the operation of the corporate complaints procedure between 1st April 2021 and 31st March 2022. The statistics for corporate complaints are set out by service area.

A complaint is defined within the Council as:

*“An expression of dissatisfaction, however made, about the standard of service, action or lack of action by the Council, or its staff, affecting an individual customer or group of customers.”*

Complaints recorded under the corporate complaints procedure do not include ‘first time’ representations which are effectively requests for a service and dealt with as such. A new report of a pothole or a missed bin for example, would not be registered as a complaint, but as a request for service. Of course, in the event that we failed to respond to the ‘request’ appropriately, then that may generate a complaint.

The number of compliments received and recorded during 2021/22 is also set out in this report. Many people get in touch with a compliment when the information or support they have received has exceeded their expectations. We like to recognise compliments alongside any complaints. It is good for us to say ‘thank you’ to our teams and staff too.

## 2. Our complaints procedure

The Council's complaints procedure reflects guidance given in the Welsh Government Model Policy and Guidance Paper for Handling Complaints. This was further supported by the Public Services Ombudsman for Wales.

Complaints, comments and compliments can be made face-to-face or by telephone, email, letter or by using the online form found on the Council's website.



**Complaint received.** A complaint can be registered via any Council venue and once received, should be forwarded to the Service Area Complaints Manager. Every Council service area has a lead officer for complaints. The Complaints Manager will ensure complaints are acknowledged and recorded and facilitate the investigation of the complaint in accordance with the corporate complaints procedure.

**Acknowledgment.** The Complaints Managers will aim to acknowledge complaints within 5 working days. At this stage, we can let the customer know who is dealing with their complaint and our understanding of what the customer's complaint entails. We can also let the customer know that a full response will follow within 20 working days of our receipt of the complaint.

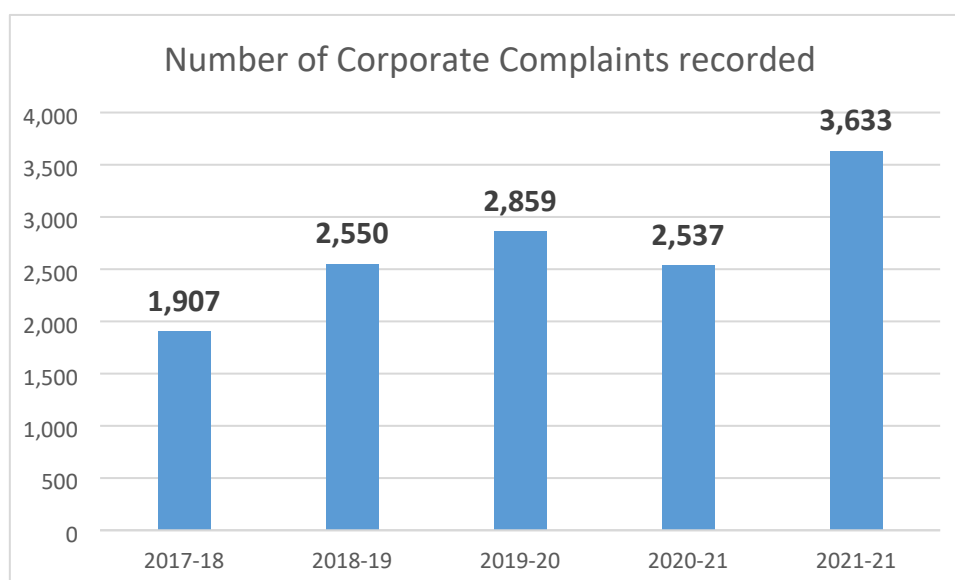
**Full response.** At the end of an investigation, a response should be produced depending on how a customer has indicated they prefer to be contacted. The response should include the outcome of the investigation as well as any necessary action taken for service improvement. The Public Services Ombudsman for Wales states that the aim of every formal investigation should be to "investigate once, investigate well". Advice will also be included on the full response on what the complainant should do if they remain dissatisfied with the outcome – to contact the Ombudsman.

**Public Services Ombudsman for Wales.** Complaints that progress to the Ombudsman will have been thoroughly investigated by the service area. If a complainant remains dissatisfied, it is for the Ombudsman to assess whether there is any evidence of service failure or maladministration not identified by the Council.

### 3. Complaints for Cardiff Council in 2021-22

A total of **3,633** complaints were recorded during 2021/22. This is an 43.2% increase from the previous year, when 2,537 complaints were recorded.

Year	Number of complaints
<b>2021-21</b>	<b>3,633</b>
2020-21	2,537
2019-20	2,859
2018-19	2,550
2017-18	1,907



For context, on the subject of complaints increases across Wales, The Public Services for Ombudsman for Wales published the following;

“Last year the number of complaints referred to us regarding Local Authorities increased by 47% (compared to 20/21 figures) and are now well above pre-pandemic levels. It is likely that complaints to my office, and public services in general, were suppressed during the pandemic, and we are now starting to see the expected ‘rebound’ effect.”



## 4. Complaints breakdown for Cardiff Council

A total of 3,633 complaints were recorded during 2021/22. This is an 43.2% increase from the previous year, when 2,537 complaints were recorded.

A breakdown of the number of complaints received by service area can be found below.

<b>Service Area</b>	<b>Number of complaints 2020/21</b>	<b>Number of complaints 2021/22</b>
Waste Collections	1,479	<b>2,089</b>
Housing & Communities	433	<b>655</b>
Customer & Digital Services	66	<b>179</b>
Traffic & Transportation	105	<b>184</b>
Finance	103	<b>152</b>
Parks & Harbour Authority	129	<b>85</b>
Environmental Enforcement	60	<b>57</b>
Highways Maintenance	42	<b>56</b>
Economic Development	25	<b>48</b>
Planning (including Building Control)	23	<b>48</b>
Education	39	<b>37</b>
Bereavement & Registration (including Cardiff Dogs Home)	25	<b>27</b>
Governance & Legal Services	2	<b>12</b>
HR	6	<b>4</b>
<b>Total</b>	<b>2,537</b>	<b>3,633</b>

This report does not consider Social Services complaints. Complaints for Social Services are recorded under their statutory complaints procedure. However, a breakdown of the number of complaints received by Social Services can be found below.

<b>Service Area</b>	<b>Number of complaints 2020/21</b>	<b>Number of complaints 2021/22</b>
Adult Services	64	<b>116</b>
Children's Services	140	<b>247</b>

## 5. Compliments breakdown for Cardiff Council

As an organisation, we receive many positive comments about our staff and the services we provide. Knowing where things are working well and are appreciated is as important to capture as knowing where things are perhaps not working. We therefore keep a record of the compliments we receive as well as the complaints. Good practice and learning can then be circulated across the Council.

A total of 1,487 complaints were recorded during 2021/22. This is an 22.2% decrease from the previous year, when 1,912 complaints were recorded.

A breakdown of the number of compliments received by service area can be found below. We have also provided examples of the types of compliments received throughout the report.

Service Area	Number of compliments 2020/21	Number of compliments 2021/22
Housing	703	544
Waste Collections	394	258
Customer & Digital Services	274	255
Economic Development, Parks & Harbour Authority	213	144
Environmental Enforcement	138	114
Bereavement & Registration Services	72	84
Planning, Transport & Environment	117	81
Finance	1	3
Education & Lifelong Learning	0	2
Governance & Legal Services	0	2
<b>Total</b>	<b>1,912</b>	<b>1,487</b>

This report does not consider Social Services compliments. However, a breakdown of the number of compliments received by Social Services can be found below.

Service Area	Number of compliments 2020/21	Number of compliments 2021/22
Adult Services	44	189
Children's Services	178	152

## 6. Complaints to the Public Services Ombudsman for Wales 2021/22

A key indicator of how satisfied complainants are with the standard of investigation and the fairness of outcomes is the number of complainants that escalate their complaint to the Public Services Ombudsman for Wales.

The Ombudsman closed **159** cases involving Cardiff Council compared to 100 cases in 2020-21. The Ombudsman received 40 premature complaints (defined as when the Council has not had a reasonable opportunity to deal with the complaint itself).

A further 50 cases were declined because the Ombudsman was satisfied with action proposed or taken by the Council. 39 cases were closed by voluntary settlements during 2021/22. These are redress proposals (an apology / change of process / time and trouble payment) which enable cases to be closed without the need for full investigation. Of the 159 cases, just 6 proceeded to investigation during 2021-22.

The Ombudsman closed the cases for the following reasons:

	2020-21	2021-22
Complainants had not exhausted the Council's complaints process - they were referred back to the Council	25	<b>40</b>
Cases closed by the Ombudsman after initial consideration <ul style="list-style-type: none"> <li>• e.g. no evidence of maladministration or service failure</li> <li>• no evidence of hardship or injustice suffered by the complainant</li> <li>• little further would be achieved by the Ombudsman pursuing the matter</li> </ul>	33	<b>50</b>
Cases declined because Ombudsman was satisfied with action proposed or taken by Council (Quick-Fix / Voluntary Settlement)	23	<b>39</b>
Cases out of Ombudsman's jurisdiction	16	<b>24</b>
Cases withdrawn by complainant	0	<b>0</b>
Complaint led to an Ombudsman's report	3	<b>6</b>
<b>Total</b>	<b>100</b>	<b>159</b>

## **Ombudsman Complaints - a yearly comparison**

The table below shows the total number of complaints made to the Ombudsman regarding Cardiff Council over the last five years.

Year	
<b>2021-22</b>	<b>159</b>
2020-21	100
2019-20	120
2018-19	110
2017-18	123

## **Investigations leading to reports**

The Ombudsman issues a report if he finds that a complainant has suffered hardship or injustice through the Council's maladministration or service failure.

Under the Public Services Ombudsman (Wales) Act 2005, the Ombudsman can issue one of two types of report following an investigation into a complaint by a member of the public: Section 16 and Section 21.

### **Section 16 Report**

The first type of report is known as a Section 16 report. This is issued when the Ombudsman believes that the investigation report contains matters of public interest. The Council is then obliged to publicise the report at its own expense. The Ombudsman issued 5 Public Interest Reports against Cardiff Council during 2021-22.

### **Section 21 Report**

The Ombudsman can issue a Section 21 report if the Council agrees to implement any recommendations he has made and if he is satisfied that the case does not raise matters of public interest. The Ombudsman issued 1 Section 21 report during 2021-22.

## 7. Learning from complaints

Complaints provide valuable feedback and are viewed by our staff as a positive opportunity to learn from experiences in order to drive continual organisational improvement and prevent similar things happening again.

Our complaints handling procedure helps us to address a customer's dissatisfaction and may also prevent the same problems that led to the complaint from arising again. For our staff, complaints provide a first-hand account of the customer's views and experience, and resolving complaints early saves resources and creates better customer relations.

Every Council Service Area has a lead officer for complaints and Corporate Complaints Workshops have been set up to look at common issues relating to complaints handling, including standardising responses to customers, collecting customer views and developing templates.

Some of the actions we take in response to complaints might appear to be small but they can make a big difference. Examples - big and small - of what we have done as a result of learning from complaints can be found throughout the report.

## 8. Complaints by area

### Waste Collections

Service Area	2020/21	2021/22
Waste Collections	1,479	2,089
Number / Percentage of complaints responded to on time	921 (62.27%)	1,469 (70.3%)

Total complaints closed within timescales					Complaint outcome	
Service Area	20 working days	After 20 working days but within 3 months	After 3 months but within 6 months	After 6 months	Upheld	Not upheld
Waste Collections	1469	566	41	13	2052	37

### Environmental Enforcement

Service Area	2020/21	2021/22
Environmental Enforcement	60	57
Number / Percentage of complaints responded to on time	44 (73.33%)	33 (57.9%)

Total complaints closed within timescales					Complaint outcome	
Service Area	20 working days	After 20 working days but within 3 months	After 3 months but within 6 months	After 6 months	Upheld	Not upheld
Environmental Enforcement	33	22	2	0	57	0

2021/22 has been another challenging year when considered within the context of the COVID-19 pandemic, the shortage of HGV drivers intensified by Brexit and city-wide operational changes to the shift patterns of all waste collection staff. These 3 main factors have all had a significant impact on the running of the waste collection service.

During the week commencing 22nd February 2021, a new way of working was introduced with collections now taking place across 4 days on a single shift between 6am and 3:45pm. The service had anticipated an increase in complaints during this period as this change 'bedded in' and crews became familiar with their new rounds. When considering the monthly data, missed collection complaints peaked in May and June of 2021 but had settled back down by August. These months are largely responsible for the increase in complaints recorded during 2021/22.

In the first two quarters of 2021/22, due to HGV driver shortages, garden waste collections were regularly disbanded or delayed and recollected on weekends, prompting complaints.

Following an increase in missed assisted lift complaints, a service review was undertaken in March 2022, which included survey results from service users. Based on this feedback an action plan was devised and as part of the review, several actions have been implemented:

- Customer service improvements with a designated Correspondence Officer to try and resolve repeat complaints.
- Digital changes to in-cab devices so drivers have sight of easily accessible information and able to confirm collections made at each assisted lift property.
- Increased workforce training.
- Supervisor monitoring.
- Regular reviews.

Going forward, it is anticipated that the following actions will assist in reducing missed collections, and therefore the number of complaints received:

- To continue the rolling replacement of our vehicle fleet with access to newer and more reliable vehicles.
- To maintain the distribution of clear and concise information to residents in relation to any disruption or change to service.
- To utilise our back office waste management technology 'Collective' to effectively manage collection schedules. This, in turn, will provide up to date real-time information to residents via the App and Web on the status of their waste collections.
- In-house training for drivers to build resilience.

When considered relative to the number of waste collections that are carried out across the city every year, maintaining services during a global pandemic, and introducing a new way of working, the number of complaints received is considered to be extremely low. At present, the Council provides waste collection services for over 175,000 properties. In 2021/22, 25,307,248 collections took place and 16,895 were reported as missed. Therefore, the amount of reported non-collections relates to less than 0.07% of the collections made during this period.

## Compliments

- ✓ Waste - Resident emailed to say how impressed they were with the staff at Lamby Way Recycling Centre on their recent visit. Without exception the staff were cheerful and helpful. They gave clear directions, went out of their way to assist them with their heavier items and advised how to fix their broken wheelie bin. When they realised they had forgotten to recycle a small item in the lower section of the facility, the staff took it to recycle for them, to save them driving round the site again. Please pass on their thanks to the staff in question and, perhaps just as important, to their supervisors.
  
- ✓ Enforcement - The resident commented that she loves the Enforcement & Waste Collection Team and thinks that they are absolute heroes. Taking away the rubbish year after year in all weathers. She thinks that the crew are amazing and really appreciates the fantastic work that they do, especially in the hot weather.

## Planning, Transport & Environment

Service Area	2020/21	2021/22
Highway Maintenance	42	<b>56</b>
Planning (including Building Control)	23	<b>48</b>
Traffic & Transportation	105	<b>184</b>
Total	170	<b>288</b>
Number / Percentage of complaint responded to on time	134 (78.82%)	<b>229 (79.5%)</b>

Service Area	Total complaints closed within timescales				Complaint outcome	
	20 working days	After 20 working days but within 3 months	After 3 months but within 6 months	After 6 months	Upheld	Not upheld
Highway Maintenance	40	12	3	1	16	40
Planning (including Building Control)	43	5	0	0	tbc	tbc
Traffic & Transportation	146	28	7	3	43	141



The number of complaints received during 2021/22 (288) has seen an increase of 118 compared to 2020/21 (170). This is an increase of 69.4% and was anticipated due to the relaxing of COVID-19 restrictions, and also that certain enforcement functions have transferred to the Planning, Transport & Environment directorate (such as abandoned vehicles and illegal advertising).

**Highway Maintenance** received 56 complaints for 2021/22 which is an increase of 12 on the previous year. The majority of complaints were received as follows:-

The highest number of complaints related to Asset Management where 25 complaints were received for 2021/22. The largest area of complaints were concerning carriageway/footway defects where 12 complaints were received for the delay in the repair of carriageway/footway defects, and also 13 for the quality of the repair itself.

It should be noted that although interim repairs may not look aesthetically pleasing, they are effective in making the area safe until permanent repairs can be undertaken.

Resurfacing works received 8 complaints. The majority of complaints were regarding vehicles being removed so that works could be undertaken (advance warning is given when works are being undertaken in an area), or the cancellation/delay in works being carried out, which is usually due to adverse weather conditions.

Maintenance Operations received 14 complaints. It should be noted that once a blocked drained has been reported, a drainage crew will attend the location and cleanse/flush the drain accordingly. Also, when there are torrential downpours, the cause of flooding can sometimes be attributed to the drain reaching its capacity and not any actual blockages to the drain.

**Traffic & Transportation** received 184 complaints for 2021/22 which is an increase of 79 on the previous year. As mentioned previously, a major factor in this increase has related to Highway Licensing and Streetworks Enforcement complaints (67 complaints). These complaints cover a range of functions from table & chair licences, vehicle crossovers, abandoned vehicles, to skip licences, and can be quite emotive.

Officers endeavour to be as accommodating as possible, but have to work with a legal framework when considering the issues. However, it should be noted that this area also received the highest number of compliments (22).

Road Safety / Transport Schemes received 40 complaints, and this can be attributed to the huge implementation of schemes which are currently being undertaken. Although these comments are logged as complaints, essentially the information is classed as feedback to the scheme and included as part of the post-scheme monitoring process. These comments are a valuable aid when assessing if any adjustments are required to a scheme.

The Civil Enforcement Team received 38 complaints for 2021/22. The majority of these complaints were regarding parking enforcement which can be expected due to the relaxing / removal of restrictions and the increase in commuter travel.

## Compliment

- ✓ “That's great thank you so much XXXX! All your hard work it very much appreciated. I am sorry for the constant e-mails, but as you can imagine we are keen to get the outside area up and running again.”

## Learning from complaints

- ✓ A review of complaints received established that the Directorate has received complaints concerning the criteria for highway licensing. People reported that it was confusing trying to find the relevant information in regards to areas such as skip licences and table and chair licenses. This problem has been alleviated to a certain extent with the introduction of a dedicated web page/portal where all the relevant information can be found in one place and the appropriate application can be made.

## Bereavement & Registration

Service Area	2020/21	2021/22
Bereavement & Registration	25	<b>24</b>
Cardiff Dogs Home	0	<b>3</b>
Number / Percentage of complaints responded to on time	25 (100%)	<b>27 (100%)</b>

Service Area	Total complaints closed within timescales				Complaint outcome	
	20 working days	After 20 working days but within 3 months	After 3 months but within 6 months	After 6 months	Upheld	Not upheld
Bereavement & Registration	24	0	0	0	13	11
Cardiff Dogs Home	3	0	0	0	1	2

**Bereavement and Registration Services** recorded 24 complaints during 2021/22, a small decrease from 2020/21 (25 complaints). Bereavement and Registration Services actively encourages the bereaved and all Registration Service users to contact them should they experience any issues with any burial, cremation, marriage, or registration service as these are such significant events where there can be no errors.

Complaints are received by email, via C2C, in writing and via Bereavement Services' reception area where service monitor forms are completed. All complaints are recorded on a database and dealt with as soon as possible and always within the timescale. Service Provision Questionnaires are sent to all those who use Bereavement and Registration Services which provides an additional avenue for people to advise us of any issues with the services they have received.

It is important to note that due to the high number of visitors to the service – with over 4,000 funeral services per annum, approximately 500,000 visitors to our sites, 9,000 registrations for births and deaths, and 1,500 marriages – the complaints are very minimal. Furthermore Citizenship Ceremonies are also organised by the Register Office.

Bereavement and Registration Services is a 'right first time' service in which our customers, the bereaved, or those carrying out life changing events are our ultimate priority. Customer requests and comments via service monitor forms and questionnaires are scrutinised and service standards have been developed to inform the public. From these standards, monthly performance data is monitored to ensure that we are meeting our commitments to Cardiff's citizens. Annually our level of customer satisfaction averages 99%.

Bereavement Services' complaints reported would equate to under 0.01% of all visitors and service users to our offices and sites. Visitors often come to us in quite a vulnerable state which can mean that small issues may become of increased importance to them. Service Monitor Forms are then monitored via our monthly statistics and at operational meetings. Trends in service requirements are then considered at this point as well. Where an error has occurred, we will also proactively apologise in writing to the family concerned to try and stop an issue escalating or a complaint being received.

Registration Services is also an area in which our citizens are undertaking life changing events and as such we must respond to their needs with sensitivity and understanding. We also register deaths at University Hospital of Wales and work with the team there to ensure that any issues are dealt with in a timely manner. Again, questionnaires are sent out to all service users to proactively seek their comments. All life events can prove challenging for those undertaking the registration of a death or birth or arranging a marriage.

Nearly all the positive comments and feedback concerning the services received at the Register Office are based around ceremonies. These can be ceremonies at Approved Venues, Register Office ceremonies and Citizenship ceremonies. Here the comments are all praising the staff; their knowledge and experience and the way that those interacting with the service are put at ease especially at such life changing moments. The work of the staff and their understanding make these days truly special and memorable. Similarly positive feedback concerning public interactions with staff is also apparent in Bereavement Services where staff often go the extra mile to ensure that a funeral or service that is delivered is done so in a sympathetic and understanding way.

## Compliment(s)

- ✓ Can I say that all your team have been outstanding during the pandemic – patients (in very difficult circumstances) have been very complimentary about the service and have said that everything has gone very smoothly. We've been very grateful for your support. From the team here, thank you very much!
- ✓ In fact the empathy and support of everyone we dealt with (the cremation service), without exception, reminded us that there are many good people out there, helping to raise our spirits during what could have been a very trying time.

## Learning from complaints

- ✓ In October 2021, a major investment in the audio-visual technology was undertaken at both crematorium chapels and the Register Office. Within Bereavement Services, this new offering has included the re-positioning and increased size of the monitors which show the visual tributes. A new contract for the provision of audio-visual services at both venues has improved what is available to the public and as such these measures have seen a marked decrease in the complaints received concerning audio-visual aspects of a cremation service.

## Education & Lifelong Learning

Service Area	2020/21	2021/22
Education	39	37
Number / Percentage of complaints responded to on time	35 (89.7%)	27 (72.9%)

Service Area	Total complaints closed within timescales				Complaint outcome	
	20 working days	After 20 working days but within 3 months	After 3 months but within 6 months	After 6 months	Upheld	Not upheld
Education	27	10	0	0	11	26

The **Education and Lifelong Learning** Directorate received 37 formal complaints via the Council's Corporate Complaints procedure in 2021/2022. This is a small decrease from the 39 recorded during 2020/21.

The Directorate responded in full to 73% of the complaints received within 20 working days of receipt. The remaining 10 cases were responded to within 3 months. Within this, a number of 2021/2022 complaint cases are returning cases, wherein the complainant was not satisfied with the LA's response or added additional complaints to their existing case. This can explain, in part, the reason for the number of cases that exceeded the 20 working day response period. These cases have now been satisfied and further procedures have now been implemented to prevent extension and reopening of cases, for example, liaising with Corporate Complaints for their guidance where a case is considered closed.

The most common category that complaints fell into was Schools Catering, which made up 27% of all complaints received. Most of these complaints occurred as a consequence of lessening of COVID restrictions and the want to return to pre-COVID meals within schools, including where there have been periods where hot meals have not been provided, greater variety and more nutritious.

The category and nature of Admissions complaints - as the category with the most complaints the previous year and the second highest for this year – can mostly be attributed to school placement, either a lack of or non-preferred placement, rather than of the Admissions process and functionality itself.

We will continue to improve the management of complaints over the next year to support good customer service in the Directorate. This includes systematic review at Education Management Team meetings to ensure that timescales are met. We will consider complaints alongside correspondence and freedom of information requests to identify areas of improvement for Education. There is also a need to review capacity to support school complaints and investigations, as well as ensuring we have a child friendly complaints procedure in line with ambitions to embed children's rights.

It is important to note that under Section 29(1) of the Education Act 2002, governing bodies of all maintained schools are required to establish procedures for dealing with complaints relating to the school or to the provision of facilities or services. The Local Authority does not have a role in investigating or resolving complaints about schools. The Welsh Government has issued guidance to support schools in dealing with complaints entitled Complaints Procedures for School Governing Bodies in Wales (Welsh Government circular no 011/2012). Within the guidance, it is the responsibility of the Local Authority to satisfy itself that all schools it maintains have adequate complaints procedures in place and that these are published. A governing body complaints procedure may, with the agreement of the local authority, include a stage for the local authority to consider the complaint. However, the statutory responsibility for dealing with a complaint remains with the governing body.

### **Compliments**

The Directorate received a number of compliments from a range of service users via email, telephone and social media channels but unfortunately these were not formally tracked and monitored during 2021-22. However, the team has put processes in place so that the good service provided by Education staff can be represented in future reports.

- ✓ I think you and your team are doing an amazing job at a time when more and more pressure is put upon systems, and the teams responsible for the systems and demand for complex reports has increased exponentially. I feel that the response time to my queries is quick and always friendly and explanatory. Even if something isn't easily solved i feel I'm kept updated ... I feel your team doesn't always get the acknowledgement deserved for the essential work you do. Thank you''
- ✓ The Cardiff Commitment team is an exemplar of good practice in relation to the links developed between Schools and Settings and Industry. There is a clear ambition to ensure that careers education is embedded across all areas of the curriculum through the provision of a wide range of relevant work-related learning experiences and environments. This will help prepare Learners for the challenges and opportunities of further learning and the ever-evolving world of work.

It can also be noted that in 2021-22, the Local Authority's Education Service was inspected by Estyn. The report identifies three areas of excellent practice in supporting children and young people – Cardiff Commitment, support for asylum seekers and transforming youth work.

## Economic Development

Service Area	2020/21	2021/22
Economic Development	25	<b>48</b>
Number / Percentage of complaints responded to on time	21 (84%)	<b>42 (87.5%)</b>
Parks & Harbour Authority	129	<b>85</b>
Number / Percentage of complaints responded to on time	94 (72.86%)	<b>65 (76.5%)</b>

Service Area	Total complaints closed within timescales				Complaint outcome	
	20 working days	After 20 working days but within 3 months	After 3 months but within 6 months	After 6 months	Upheld	Not upheld
Economic Development	42	6	0	0	23	25
Parks & Harbour Authority	65	16	3	1	33	52

During 2021/22 **Economic Development** received 133 complaints which comprise of 7 for City Centre Management, 4 for Strategic Estates, 8 for Venues and Tourism (this includes Cardiff Castle, the Events team, Cardiff Caravan Park and the Norwegian Church), 9 for Economic Development, 7 for Major Events, 13 for Property Services (previously Facilities Management) and 85 for **Parks**.

There has been a slight decrease in complaints for Economic Development, however we have had a big decrease in complaints for Parks during the year. A review of complaints received by Parks and applying the Council's Corporate Complaints Policy more stringently has resulted in a large decrease in complaints received. It was established that many of the complaints for Parks were actually "requests for service" (such as grass cutting) and therefore are now being treated as such in the first instance. If a complainant is dissatisfied with the response from Parks to their grass cutting request, they are then able to make a formal complaint.

### **Compliments**

- ✓ Economic Development - "I attended the event at Cardiff Castle on Sunday evening and wanted to compliment the Council, Fuel and all others involved for a very well organised event. The venue and facilities were perfect along with three of my favourite bands performing it made for a fantastic evening. After the event I walked back through the city centre to my hotel alone yet felt very safe particularly due to the visible police presence and the number of venues with door staff. It was my first visit to Cardiff and it definitely won't be my last, the city is very visitor friendly, has a vibrant night life and I would consider attending similar events in future. Thank you".
- ✓ Harbour Authority – "Thank you most sincerely for your help today in securing my boat, much appreciated and it really helped that I didn't have to swing it back round. Thanks again for all your help"
- ✓ Parks – "Thank you for your email and to everyone else in this email trail, I am truly blown away by the kindness and work everyone has put into returning this precious bear to my grandson and very excited to see the reunion take place tomorrow! My father is going to be delighted to hear this news as it was him who originally gave the bear to XXXX after he was born, his first great grandchild, hence the additional poignancy and sentimentality of this story! You have all gone above and beyond!!"

### **Learning from complaints**

- ✓ Economic Development received a complaint regarding road closures due to filming around Cardiff Bay and the lack of warning about disruptions at the bus stops prior to the filming. We apologised to the complainant and explained that discussions would be taking place with Cardiff Bus to ensure that in future the bus stops would contain clear accurate information regarding any road closures/disruptions to service.

## Revenues

Service Area	2020/21	2021/22
Revenues	103	152
Number / Percentage of responses sent within 20 working days	80 (78%)	145 (95.4%)

Total complaints closed within timescales					Complaint outcome	
Service Area	20 working days	After 20 working days but within 3 months	After 3 months but within 6 months	After 6 months	Upheld	Not upheld
Revenues	145	7	0	0	43	109

The number of complaints recorded by **Revenues** during the financial year increased from 103 in 2020/21 to 152 in 2021/22 (around a 48% increase). Though this represents an increase, the volume of complaints is considered similar to the volume received pre-pandemic and can mostly be attributed to the reintroduction of recovery action, which was paused during the pandemic.

The percentage of complaint responses being issued within corporate timescales has increased significantly to 95%, whereas this has previously been 80% (in 2019/20) and 78% (2020/21). This increase can be attributed to the filling of a long term vacant post (where the previous incumbent was also on long term sick leave), along with improved working practices and complaint management.

### Compliment

- ✓ “Hi all, I made an online payment for my council tax and then filled out the form to have my remaining instalments. I completed the form at about 8 am Monday morning. Within a few hours I had someone call me to explain what my new payments would be and generate a new bill. I don’t remember his name unfortunately but he was friendly, helpful and I was just so surprised to get a call so quickly. I’m really grateful for how the council have handled this, especially at a time where I am sure your staff are very stretched and working in some difficult circumstances. Thank you :)”



## Customer & Digital Services

Service Area	2020/21	2021/22
Customer & Digital Services	66	179
Number / Percentage of responses sent within 20 working days	66 (100%)	124 (69.3%)

Service Area	Total complaints closed within timescales				Complaint outcome	
	20 working days	After 20 working days but within 3 months	After 3 months but within 6 months	After 6 months	Upheld	Not upheld
Connect to Cardiff (C2C)	42	0	0	0	25	17
Rent Smart Wales	77	52	0	0	31	98
24/7 Services	5	2	1	0	0	8

**Connect To Cardiff (C2C)** received 42 complaints during 2021/22 which represents an increase of 75% compared to the 24 received during 2020/21. In respect of that total, 17 complaints were not upheld. Of the 26 remaining complaints, the main contributor to the increase when compared to the previous year is down to an increased time taken by officers to answer calls.

Over the course of the year, C2C has experienced challenges:

- Staff numbers – C2C has experienced challenges with resource, often resulting in several posts being vacant due to the volatile employment market facing many organisations throughout the UK but also an increase in sickness, COVID and non-COVID related.
- Wait Times – impact of the staffing numbers/recruitment challenges and driven by activities in Service Areas which has meant realigning resources in C2C to meet areas of greatest pressure which has led to higher wait times for some services.
- Staff challenges – a dispersed workforce has created its own issues and impacted on the performance of the contact centre – this is being resolved by returning officers to the office so we can provide greater support.

Many established members of staff have rightfully remained working to support public health efforts in Cardiff Council hosted services such as Track and Protect and the replacement of their expertise is a gradual process, at times creating vacancies further down the chain which has impacted on frontline resource.

With C2C being the first point of contact for the council, performance is directly affected by other services demands, projects and communications to the public and where other services are experiencing challenges, this has also impacted C2C.

Following investigation of each upheld complaint that was not related to the wait time, full feedback and (where necessary) refresher training was carried out to enhance the services we provide. C2C are constantly striving to provide a fully rounded customer journey for every customer whether it be via the telephone or our multiple digital channels. It should be noted that no C2C complaints were escalated to the Public Services Ombudsman for Wales and were completed entirely within Cardiff councils internal process which is indicative that responses were thorough and meaningful.

Customer & Digital Services continues to promote Customer Service throughout the council and the impacts it can have on the customer journey when interacting with the council and how it can aid complaint handling. C2C's in-house coaches deliver Customer Service Training, which is offered to all council staff, providing attendees with the skills they need to effectively deliver services with the customer at the forefront of service delivery. Our in-house coaches have also worked with the Public Services Ombudsman for Wales to create a bespoke Complaints Training program for all staff with the aim of further enhancing complaint handling when things do go wrong.

### **Compliment**

- ✓ Had the need and the luck to contact @cardiffcouncil C2C service this evening. Got supported by one of the nicest and most helpful contact centre people I have ever spoken to. Anywhere. Well done Cardiff Council. Do look my details up and (thank) him if you can.

In June 2021, **Rent Smart Wales** entered its five-year renewal period, which resulted in a 138% increase in customer contact across the 2021-2022 period. This increase generated a backlog of emails and Contact Us forms leading to customer replies being delayed. Some customers also experienced difficulties with the Rent Smart Wales website, with some being logged out and slow loading of webpages. These factors have contributed to an increase in complaints during 2021/22, with 129 complaints being recorded.

Customer complaints received were generally about service provision during the peak renewal period, the tone of renewal correspondence, and the fees charged by Rent Smart Wales for renewal.

Since March 2022, service standards/targets for dealing with correspondence have been met and the backlog has been cleared. As a result, the number of complaints has correspondingly declined.

Rent Smart Wales is in the process of reviewing the renewal processes, related automated communications and the complaint management procedure with a view to securing future improvements and specifically more efficient complaint handling.

**24/7 Services** received 8 complaints during 2021/22 which is a 50% reduction compared to 2020/21 when 16 complaints were received. The number of complaints concerning the Meals on Wheels service has decreased and this can be attributed to improved communication and working practices. This can also be evidence by our increase retention of customers for the service.

With regards to our Telecare service, just 2 complaints were received. A dedicated Customer Care Team Leader is now in place. This has now enabled a review and update of a number of processes providing consistent support to the team to enhance performance.

### Compliment

- ✓ Had the need and the luck to contact @cardiffcouncil C2C service this evening. Got supported by one of the nicest and most helpful contact centre people I have ever spoken to. Anywhere. Well done Cardiff Council. Do look my details up and (thank) him if you can.

## Governance & Legal

Service Area	2020/21	2021/22
Governance & Legal	2	12
Number / Percentage of responses sent within 20 working days	2 (100%)	12 (100%)

Service Area	Total complaints closed within timescales				Complaint outcome	
	20 working days	After 20 working days but within 3 months	After 3 months but within 6 months	After 6 months	Upheld	Not upheld
Governance & Legal	12	0	0	0	3	9

Of the 12 complaints recorded for **Governance & Legal Services** during 2021/22, 8 were for Electoral Services with one upheld, two partially upheld and the remaining five not upheld.

Six complaints were received in relation to the combined poll in May 2021 for the Senedd Cymru and Police and Crime Commission Elections, these elections were delivered facing several challenges including the franchise change for votes at 16 and qualifying foreign nationals, a combination poll with different franchises, a cross boundary poll and the requirement to deliver the poll under Covid-19 restrictions. That said most complaints received were not upheld as the processes undertaken were correct and in line with legislation.

The remaining two complaints related to electoral registration and access to the electoral register, although the elector raised concerns the processes followed were legislatively correct

## Housing & Communities

Service Area	2020/21	2021/22
Housing & Communities	433	655
Number / Percentage of complaints responded to on time	392 (90.5%)	127 (19.4%)

Service Area	Total complaints closed within timescales				Complaint outcome	
	20 working days	After 20 working days but within 3 months	After 3 months but within 6 months	After 6 months	Upheld	Not upheld
Housing	127	502	26	0	271	384

**Housing & Communities** experienced an increase in complaints during 2021/22 as 655 complaints were recorded, compared to 433 in 2020/21

The knock-on effects of the pandemic and its related restrictions contributed to an overall increase in complaints related to Cardiff Council's Repair Service. As routine and non-emergency jobs/inspections were delayed during periods of restrictions, there has been a long-lasting backlog of repair jobs which has continued to add to the delay of pre-existing jobs and the responses to newly raised jobs. A noticeable surge in complaints related to these delays has been evident.

The impact on housing and the temporary ban on evictions initially contributed to a decrease in housing/homelessness complaints during 2020/2021. However, the uncertainty of the newly ratified legislation, the Renting Homes Act, and the lifting of the temporary ban seems to have contributed to an increase of complaints regarding private landlords, eviction notices and the reactions of homelessness/housing services in Cardiff Council.

2021/2022 has been a challenging year for many complainants. During the tail-end of the year, with uncertainty and concern regarding the continued widespread cost of living crisis, we have started to see many complainants refer to these challenges as they look to Cardiff Council for support. The Housing & Communities directorate has a dedicated team dealing with complaints and remains committed to learning from complaints and improving the service for all its customers.

### **Compliments**

- ✓ Hubs – “Good afternoon, I recently contacted Llandaff North and Gabalfa Hub regarding room hire. XXX, who dealt with my query was very helpful, knowledgeable and kept me informed regarding availability and other relevant details. It was a pleasure to deal with someone who was so customer focussed, with a positive and helpful approach which was very refreshing”.
- ✓ Caretaking Services – “Today I had a tree/garden team at my home ... sorting out the garden as I'd just moved in Monday and it was a terrible state. They were the most amazing 4 lads I've ever had the pleasure of dealing with. Constantly keeping me updating checking I was OK with the work every step of the way. So polite and friendly not just with me but with the neighbours also. Absolutely fantastic bunch of lads. A team that deserve the utmost amount of praise! Thank you so much”.

Mae'r dudalen hon yn wag yn fwriadol

**CARDIFF COUNCIL  
CYNGOR CAERDYDD****CABINET MEETING: 28 SEPTEMBER 2022**

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**BUDGET MONITORING – MONTH 4 2022/23****FINANCE, MODERNISATION & PERFORMANCE (COUNCILLOR  
CHRIS WEAVER)****AGENDA ITEM: 7**

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**Reason for this Report**

1. To provide the Cabinet with details of the projected 2022/23 financial monitoring position as at the end of July 2022 (Month 4) adjusted for any significant amendments since that date, against the budget approved by Council on 3rd March 2022.

**Background**

2. Council approved the 2022/23 budget on the 3<sup>rd</sup> March 2022 with the key sources of funding underpinning the budget being Revenue Support Grant (RSG) from Welsh Government, the amount forecast to be raised by Council Tax, contributions from earmarked reserves and other income sources including fees and various specific grants. RSG increased by 10.7% (£52.6 million in cash terms after adjusting for transfers) in 2022/23 although the context was one of transitioning into a post pandemic period and significant uncertainty and risk evident across many areas.
3. The 2022/23 budget also heralded the end of the Local Authority Hardship Fund which meant that the Council would need to ensure it could cover any ongoing COVID-19 related pressures (both expenditure and income) from within its own budgetary allocation.
4. The legacy of the pandemic and other more recent factors such as energy pricing and the cost of living crisis have significantly increased further the levels of risk. The Council faces unprecedented challenges in terms of financial resilience which will require close monitoring and management during this year and into the medium term. This monitoring report will set out the current known pressures and risks and any subsequent mitigations being undertaken. The report provides details of the overall revenue position, including performance against budgeted savings targets and a detailed position update on the Capital Programme.

**Issues****Revenue Position**

5. The overall revenue position reported in the paragraphs that follow comprises

of projected variances, including any shortfalls anticipated against 2022/23 budget savings proposals and any savings or efficiencies that have been identified during the year.

6. The overall monitoring position, as at Month 4, reflects a total projected net annual Council overspend of £7.368 million. This position is detailed in Appendix 1. and includes a total directorate net overspend of £11.253 million, a projected underspend of £1.700 million in relation to Capital Financing, a projected underspend against the Summary Revenue Account of £0.185 million partially offset by the £2 million general contingency budget.
7. The table below provides a summary of the overall position:.

<b>Directorate</b>	<b>Directorate Position (£000)</b>
Corporate Management	(6,474)
Economic Development:	
Economic Development	2,860
Recycling & Neighbourhood	389
Education & Lifelong Learning	5,424
People & Communities:	
Housing, & Communities	(317)
Performance & Partnerships	(81)
Adult Services	(123)
Children's Services	8,950
Planning, Transport & Environment	430
Resources:	
Governance & Legal Services	400
Resources	(205)
<b>Total Directorate Position</b>	
Capital Financing	(1,700)
General Contingency	(2,000)
Summary Revenue Account	(185)
<b>Total Council Position</b>	<b>7,368</b>

8. The Table above indicates that there is already pressure across several service areas in terms of budgetary performance and these are contributing to a significant overall projected overspend at Month 4 that will require corrective action in the remaining months of 2022/23.
9. There are several factors impacting on the bottom-line position, many of which were not evident when budgets were set in March of this year. In financial terms the pressures in Children's Services are the most significant and in the main relate to high numbers and costs of residential placements. Across broader services, post pandemic recovery has been overshadowed by an energy and cost of living crisis that has resulted in significant expenditure pressures in areas such as food costs, fuel and utilities, plus it has dampened down income recovery given the squeeze on household budgets currently.



10. It is important to note that the Month 4 projections do not include any assumptions over and above the already budgeted pay award of 3% for 2022/23. Current pay negotiations are ongoing, and the outcome of any settlement reached will be reflected in future monitoring reports.
11. The specific overspends and underspends within each directorate's position are outlined in more detail within Appendix 2. In summary the three largest variances are noted below:
  - a. **Economic Development** (+£2.680M) – Income shortfalls within Culture, Venues and Events are a significant factor contributing to the overspend, as well as the high cost of energy across council buildings. There are also pressures within Property Services and Sport, Leisure and Development.
  - b. **Education** (+£5.424M) - A key pressure contributing to this overspend is in relation to School Transport because of rising costs in fuel and driver supply combined with the increased number of pupils with additional learning needs requiring transport. There are significant pressures in respect of out of area placements and school catering services, the latter again being impacted upon by price increases in relation to food and transport costs combined with reduced income from paid school meals.
  - c. **Children's Services** (+£8.950M) – The majority of this overspend is attributable to residential and additional bespoke placements that have arisen this year reflecting the complexity of need and the limited spaces available in the residential market.
12. In relation to the above, mitigating actions are being put in place to reduce and offset the impact of these overspends.
13. As part of the Budget Strategy for 2022/23, a COVID recovery budget of £10 million was established to deal with post pandemic issues given the cessation of the Welsh Government Hardship Fund. Current issues around energy costs and the cost of living crisis have meant that this budget is also able currently to offset part of these costs. Within the Corporate Management line of the budget, the assumption is that some £6.463M of this allocation is committed at Month 4. As a response to the economic challenges officers in Education and Economic Development are looking at measures to ensure that the cost impacts are dampened to manageable levels particularly with the threat of increased headwinds over next few months. It is important to note that by reflecting the partial use of the contingency at month 4 there remains only £3.537 million of this budget allowance to cover any future risks / costs that emerge.
14. The position with respect to Children's Services has resulted in the establishment of an urgent programme of work to seek to reduce spend and deliver improvements across a range of services linked specifically to the issue of external placements. The number and complexity of cases coming through combined with the inability of the market to provide placement solutions is unprecedented at this time. The position stated includes a number of high cost bespoke placements that are currently being reviewed and any step downs or changes once confirmed will be reflected in future monitoring reports. The action being taken to mitigate the position includes focussed work on:

- a. Managing placement requests
  - b. Maximising the current placement options
  - c. Looking at options for move on
  - d. Developing the support market in Cardiff
  - e. Developing Foster Care options to meet complex needs
  - f. Addressing specific issues around unaccompanied asylum-seeking children
  - g. Improving data reporting and financial analysis arrangements
  - h. Maximising opportunities for additional grant funding and appropriate partner contributions
15. The position at Month 4 assumes use of £1.180 million of Children's Contingency to deal with the cost differential of agency staff versus full time staff. The success in terms of reducing the reliance on agency has resulted in decreased numbers of agency staff covering vacant posts but the variance in cost between agency and full time staff has increased This is being offset from contingency for 2022/23 given targets are being met as set in the Council's Corporate Plan
16. In terms of further monitoring of the Children's Services financial position, future periods will continue to reflect outcomes from the work being undertaken currently. The position also currently assumes no external grant funding is receivable and again this will be adjusted if, as in previous years, grants are made available by Welsh Government to support pressure in this area.
17. The 2022/23 Budget Report outlined Directorate savings of £7.708 million of which £1 million represented a reduction in General contingency which was actioned as part of the approval process for the Budget. This paragraph will report of the performance of the savings proposals as part of the 2022/23 budget (£6.658 million). As outlined in Appendix 3, there is an overall projected shortfall of £332,000 (5.9%) against the directorate savings target of £5.558 million. The £1.1 million of corporate savings are all projected to be achieved.
18. The Capital Financing outturn is currently forecast to be £1.700 million underspent at the end of the financial year. This forecast is set having regard to assumptions about our levels of actual external borrowing in year and timing of such; movement in bank interest rates (outside our control) and levels of daily cash balance; estimates of how any capital expenditure for the Housing Revenue Account and General Fund is to be funded as year-end. Treasury assumptions and performance will continue to be monitored closely (the mid year review will be reported to Council in November 2022) and at Month 4, only the underspend with respect to interest receivable has been factored in. The underspend is due to increases in recent Bank of England base rates resulting in higher interest income receivable on temporary cash balances, represented by bank deposits held. There are likely to be further adjustments made in future periods if the fiscal landscape remains unaltered.
19. In considering an appropriate level of bad debt provision in respect of Council Tax and having due regard to the collectability of the Council Tax in the current economic climate, the Council is still able to report an underspend in the region

of £0.483 million. This position whilst considered prudent will continue to be closely monitored throughout the financial year.

20. As part of the reported Directorate positions, contributions to and from contingency budgets have been incorporated where appropriate. As fluctuations in the CTRS budget are managed by a corporate contingency, these include a transfer from the Council Tax Reduction Scheme (CTRS) budget, of £0.120 million. The transfer reflects the current projected in year position, which takes into account the impact of the Council tax increase as well as in year demand from residents for financial support. In addition, the Children's Services position currently presumes that £1.180 million has been drawn down from the £2.500 million contingency budget held for meeting the additional costs arising from a reduction in Agency staff as referenced earlier in the report. This leaves £1.320 million for any further demand in Children's Services and the risk of increasing external residential placements for the remainder of this year.
21. Given the overspend position projected at Month 4, all services have been tasked to review opportunities to deliver in year efficiencies. These are being worked through currently to ensure deliverability and no front line service impact and, where appropriate, these will be built into future monitoring reports to further mitigate the bottom line position.
22. In addition to the general fund directorate positions, ring-fenced and grant funded accounts are outlined in more detail as part of Appendix 2. In summary, the position on the Housing Revenue Account (HRA) is currently indicating a potential surplus of £587,000. Underspends on capital financing costs due to the impact on debt repayment and external interest charges of the 2021/22 reduced borrowing requirement are partly offset by increased premises costs reflecting the current utilities market. Any surplus will be used to improve the ability to deal with future budget pressures including capital works delayed to future years and to provide more flexibility for any unavoidable future commitments. The Civil Parking Enforcement position reflects an in-year surplus of £5.455 million compared to the budgeted surplus of £5.696 million reflecting income below Harbour Authority is projecting a balanced position with increased cost pressures for dredging and barrage maintenance offset by other managed underspends. The Asset Renewal budget is anticipated to be fully spent in line with the revised work schedule.

## **Capital**

23. The Council on 3<sup>rd</sup> March 2022 approved a new Capital Programme of £230.926 million for 2022/23 and an indicative programme to 2026/27. The budget for the General Fund and Public Housing has since been adjusted to £294.713 million to include actual slippage reported at outturn, incorporation of new grant approvals and confirmation of actual grant awards.
24. The sections below indicate a forecast position for 2022/23 for the General Fund and Public Housing.

### General Fund

25. The projected outturn for the year is currently £153.626 million against a total

programme of £220.103 million with a variance of £66.447 million, which is predominantly slippage. Expenditure at the end of Month 4 was £34.826 million which represents circa 23% of the projected outturn, however there are a number of large expenditure items which are anticipated to progress during the latter part of the year.

### Capital Schemes Update

26. Delivery of capital projects is complex, may span a number of years and is influenced by a number of external and internal factors such as weather, statutory and non-statutory approval processes. Directorates continue to be reminded of the need to set achievable profiles of expenditure and to identify slippage at an early stage.
27. The Council's capital investment programme plays an essential role in both stimulating the local economy and delivering local services during the post Covid-19 recovery period. Whilst contractors have adapted to work restrictions, construction cost inflation is significant resulting from increased tender activity, material availability, labour shortages. This represents a delivery and affordability risk to projects to remain within estimated budgets following the outcome of tenders. This may require re-prioritisation of schemes to be undertaken including changes in specification where this allows the same outcomes to be met.
28. It remains important that directorates continue to allocate sufficient capacity and resource to ensuring projects progress in the timescales intended and consider opportunities to bring forward expenditure where possible. Robust business cases continue to be essential with a focus on approved schemes within the existing capital investment programme
29. At the end of 2021/22, there were a number of late external grant funding sources made available for aligned Welsh Government outcomes. This is a common theme and whilst positive, the timescales may mean late changes in programme and projections. Utilising grants bid for and awarded in approved timescales is a risk to be managed by directorates in the remainder of the year. Consideration of switching of Council resources and early discussion with grant funding bodies should be undertaken to ensure that approved grants can be used in full.
30. Further detail on progress against significant capital schemes included in the programme is included in Appendices 4 and 5 to this report.

### Capital Receipts

31. The Capital Programme approved by Council in February 2018 set a target for non-earmarked General Fund Capital receipts of £40 million, with a subsequent increase of £1 million to this target in 2019/20, after making a deduction for eligible revenue costs of disposal. Up to 31 March 2022, a total of £10.060 million has been received against the overall receipts target.
32. The current forecast of income towards the target whether by external disposal or approved land appropriations to the Housing Revenue Account (HRA) during

2022/23 is £5.5 million as set out in the Annual Property Plan 2022/23. Receipts to date are £2.5 million in relation to the Council's freehold interest of land in St Mellons approved by Cabinet in January 2022. Where sites are to be appropriated to the HRA, this needs to be within the approved budget framework for the HRA and based on an agreed independent valuation and housing viability assessment.

33. The Capital investment programme also includes a number of major development projects which assume that capital receipts are earmarked to pay towards expenditure incurred on those projects. Examples include the development strategy at the International Sports Village, Arena contribution and commitments agreed as part of proposals in respect to East Cardiff / Llanrumney Development. Expenditure incurred in advance of realisation of receipts represents a risk of both abortive costs and to the level of borrowing and should be incurred as part of a Cabinet approved business case.

#### Public Housing (Housing Revenue Account)

34. The Programme for Housing Revenue Account (HRA) is £74.610 million, and expenditure of £80.470 million is forecast, requiring budget of £5.860 million to be brought forward, primarily because of accelerated spend on the re-cladding of Lydstep flats than initially planned. Expenditure at the end of Month 4 was £23.592 million which represents circa 29% of the projected outturn.
35. Against an original allocation of £2.650 million, a total of £3.450 million is due to be spent on estate regeneration, tackling issues of community safety, defensible space, waste storage and courtyard improvements to blocks of flats. Expenditure includes projects at Belmont Walk and Pennsylvania Avenue.
36. Expenditure on building improvements is projected to be £28.245 million for the year, against a budget of £19.150 million. The variance is in large part due to the Lydstep flats recladding scheme, which is now progressing faster than anticipated meaning residents will experience minimal disruption. Following completion of development work, Cabinet will shortly consider the implementation and procurement approach to further sites for over cladding. Other improvements including roofing and central heating upgrades are progressing at good pace, contributing to the increased spend this financial year.
37. Total expenditure on adaptations for disabled residents of HRA properties for the year is forecast at £2.700 million, with slippage of £300,000 into 2023/24.
38. Expenditure on the development of new housing over several sites during the year is currently projected to total £46.075 million, against an allocation of £49.810 million. In respect of Cardiff Living, only one scheme remains in progress for Phase one, the PassivHaus scheme at Highfields which is expected to complete in the autumn of 2022, with phase two and three schemes in progress. The early-stage master-planning is well underway on the proposed older person/wellbeing village on the former Michaelston College site which will deliver in the region of 250 new homes and a wide range of public buildings providing a range of facilities for the local community with a focus on older people and health and well-being. Work is well underway for the low-carbon

scheme on the former Rumney High school site and on the former Howardian school site in Penylan, with all private houses released for sale on Howardian phase 1 having sold off-plan.

39. Progress on other development projects outside of Cardiff Living include a start on site for the St. Mellons and Maelfa older person community living buildings as well as development of homes on the former Local Training Enterprise Centre building in St. Mellons. Planning permission has been granted for the Channel View masterplan, Riverside/Canton Community Centre and the proposed development of Waungron Road, Llandaff. The former Iorwerth Jones site, Lansdowne hospital site and Canton Community Centre Site are expected to be well in progress by the end of the year, albeit some projects are delayed compared to initial expectations.
40. The construction market continues to face the impact of supply shortages and rising material prices, resulting in increases in costs for developments. There are also significant pressures and demand for affordable housing as considered by Cabinet in a report in July 2022. The costs of acquiring existing properties and buy backs for HRA housing stock as well as the cost of implementing the meanwhile use temporary housing for the gas works site have been managed within the overall housing programme, with assumptions of £12.750 million of Welsh Government grant at this stage contributing to costs. Given the cost increases, as well as demand pressures, without additional external grant funding sources, the overall HRA programme will need to be reviewed as part of its next iteration in February/March 2023 to ensure expenditure and the timing of expenditure remains affordable and sustainable.

### **Reasons for Recommendations**

41. To consider the report and the actions therein that form part of the Council's financial monitoring process for 2022/23.

### **Scrutiny Consideration**

42. The Policy Review & Performance Scrutiny Committee is due to consider this report on 26 September. Any comments received will be report to the Cabinet meeting.

### **Legal Implications**

43. The report is submitted for information as part of the Authority's financial monitoring process. The Council's Constitution provides that it is a Council responsibility to set the budget and policy framework and to approve any changes thereto or departures there from. It is a Cabinet responsibility to receive financial forecasts, including the medium-term financial strategy and the monitoring of financial information and indicators

### **HR Implications**

44. There are no HR imps that arise directly from this report.

## **Property Implications**

45. There are no further specific property implications in respect of the Budget Monitoring Month 4 2022/23 Report. During the second quarter, the Strategic Estates Department will continue to assist where necessary in delivering mitigation strategies as part of the organisation's COVID recovery and support delivery in relevant areas such as the Capital Programme, the Capital Investment Programme and Major Development Projects. The report highlights in-year financial pressures within Strategic Estates and the service area is working closely with Finance colleagues to identify mitigations and income generation opportunities which can be put in place and pursued to alleviate the forecasted budget overspend. Where there are property transactions or valuations required to deliver any budget proposals, they will be done so in accordance with the Council's Asset Management process and in consultation with Strategic Estates and relevant service areas

## **Financial Implications**

46. In summary, this report outlines a projected Council overspend of £7.368 million at Month 4 of the 2022/23 financial year. These overspends are after the offset of £2 million general contingency.. If an overspend of this level exists at the end of the financial year, it would be offset against the Council Fund Balance. Currently, the Council Fund Balance is £14.255 million and would reduce to £6.887 million in such a circumstance but this level would be considered unsustainable. However, between Month 4 and the financial year end, every effort will be made to reduce the overspend to a balanced position or identify other sources of funding such as earmarked reserves which will provide some form of financial resilience.
47. Because of this risk, it is important that directorates retain a focus on their financial positions and ensure that tight financial control is in place over the remainder of this financial year and that overspends do not worsen and, if possible, are reduced by year-end. This will require a continual review of Council-wide issues and regular monitoring of the Council's balance sheet, including the debtors' position and earmarked reserve levels.
48. In relation to the 2022/23 Capital Programme, a variance of £66.447 million is currently projected against the General Fund element, predominantly in relation to slippage against schemes. In terms of the Public Housing element of the programme, there has been a need to reprofile the capital programme from later years to fund the £5.680 million required because of the need to accelerate the spend on cladding at Lydstep Flats.
49. Historically, this report has highlighted the issue of slippage and the economic impact of rising material prices and contractor availability is contributing to potentially higher rates of slippage than have been experienced before. The increase in material prices could potentially reduce the amount of work being undertaken in asset renewal budgets in individual years to ensure capital budgets remain viable over the five-year programme. There are large expenditure items planned for the last quarter of the year and it is critical that directorates ensure that the necessary progress is made against schemes, to ensure that slippage is minimised as much as possible. Due diligence needs to

be maintained to ensure that the delay of schemes that rely on external funding does not result in the lost opportunity of accessing those funds due to tight terms and conditions dictating any timelines that must be met..

50. For capital expenditure, effective contract management will be required, with a particular focus on the prevailing economic climate causing delays or increased costs. Should such issues continue to emerge during the remaining months of the year it will be necessary for these to be escalated as a matter of priority so that the overall impact on the programme can be assessed and any required actions taken. Such risks also need to be monitored in relation to the generation of capital receipts which underpin the overall affordability of the programme

## **RECOMMENDATIONS**

The Cabinet is recommended to:

1. Note the projected revenue financial outturn based on the projected position at Month 4 2022/23.
2. Note the capital spend and projected position at Month 4 2022/23.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>CHRISTOPHER LEE</b> Corporate Director Resources
	22 September 2022

The following Appendices are attached:

- Appendix 1 – Revenue Position
- Appendix 2 – Directorate Commentaries
- Appendix 3 – 2022/23 Budget Savings Position
- Appendix 4 – Capital Programme
- Appendix 5 - General Fund Capital Schemes Update



## Appendix 1

**REVENUE MONITORING POSITION 2022/2023**

Directorate	CASH LIMIT BUDGETS			PROJECTED OUTTURN			VARIANCES		
	Expenditure £000	Income £000	Net £000	Expenditure £000	Income £000	Net £000	Expenditure £000	Income £000	Net £000
Corporate Management	37,658	(170)	37,488	31,779	(765)	31,014	(5,879)	(595)	(6,474)
Economic Development	47,517	(38,417)	9,100	47,195	(35,235)	11,960	(322)	3,182	2,860
- Recycling & Neighbourhood Services	47,197	(11,173)	36,024	51,012	(14,599)	36,413	3,815	(3,426)	389
Education & Lifelong Learning	368,635	(58,400)	310,235	376,978	(61,319)	315,659	8,343	(2,919)	5,424
People & Communities									
- Communities & Housing	259,186	(210,729)	48,457	258,818	(210,678)	48,140	(368)	51	(317)
- Performance & Partnerships	8,930	(5,611)	3,319	9,214	(5,976)	3,238	284	(365)	(81)
- Social Services - Children's Services	88,052	(9,075)	78,977	100,943	(13,016)	87,927	12,891	(3,941)	8,950
- Social Services - Adult Services	163,448	(30,961)	132,487	162,548	(30,184)	132,364	(900)	777	(123)
Planning, Transport & Environment	57,310	(49,908)	7,402	57,992	(50,160)	7,832	682	(252)	430
Resources									
- Governance & Legal Services	8,133	(1,331)	6,802	8,841	(1,639)	7,202	708	(308)	400
- Resources	31,649	(15,374)	16,275	32,789	(16,719)	16,070	1,140	(1,345)	(205)
Capital Financing etc.	40,331	(6,022)	34,309	39,131	(6,522)	32,609	(1,200)	(500)	(1,700)
General Contingency	2,000	0	2,000	0	0	0	(2,000)	0	(2,000)
Summary Revenue Account	20,471	0	20,471	20,759	0	20,759	288	0	288
Discretionary Rate Relief	400	0	400	410	0	410	10	0	10
<b>Sub-Total</b>	<b>1,180,917</b>	<b>(437,171)</b>	<b>743,746</b>	<b>1,198,409</b>	<b>(446,812)</b>	<b>751,597</b>	<b>17,492</b>	<b>(9,641)</b>	<b>7,851</b>
Council Tax Collection	0	0	0	0	(483)	(483)	0	(483)	(483)
<b>Total</b>	<b>1,180,917</b>	<b>(437,171)</b>	<b>743,746</b>	<b>1,198,409</b>	<b>(447,295)</b>	<b>751,114</b>	<b>17,492</b>	<b>(10,124)</b>	<b>7,368</b>

Tudalen 747

Mae'r dudalen hon yn wag yn fwriadol

## **Appendix 2 – Directorate Commentaries Month 4 2022/23**

### **Corporate Management (£6.474M)**

1. The Corporate management position is an offset of £6.463 million of pressures within the directorate position due to additional costs from the Cost of living crisis and prolonged impact of Covid pandemic on additional costs and loss of income. A further £11,000 budget in Corporate Management is offsetting the directorate position as this budget was allocated to Corporate Management due to last minute changes to the Local Government final settlement. Within the position £3.537 million is allocated to offset any emerging pressures as the impact of the Cost of living crisis evolves.

### **Economic Development +£2.860 million**

2. The Economic Development Directorate is forecasting a £2.860m million overspend at month 4 against the net controllable budget of £9.100 million.
3. The month 4 position for Culture, Venues and Events is forecasting a potential deficit of £1.594 million. This is made up largely of forecasted income shortfalls at Cardiff Castle (£735,000), City Hall Functions (£392,000), Functions Catering (£335,000) and St David's Hall (£110,000). Despite the ending of Covid restrictions, customer numbers and business confidence have not returned to the levels seen pre pandemic. Moreover, rising inflation and cost of living is also having an impact on consumer spending resulting in reduced attendances and spend at these facilities. For example, Castle admission and tour income is 35% down for April to July when compared to same periods in 2018 and 2019. In addition, several larger functions previously held at City Hall have not yet returned since the pandemic, which also has a knock-on effect to functions catering who would previously have catered for these large events. University exams have not returned to City Hall and are now being held in-house at universities instead, resulting in a further lost income.
4. The major financial risk for the Facilities Management budget is arising from the inflationary impact on energy prices across Council buildings. High level estimates indicate increased costs of circa £427,000 which have been reflected in Month 4 position, but this will need to be reviewed in detail with the service area as more information becomes available to further inform this position. Underspends against various other budgets reduces the overall overspend to £345,000.
5. Property Services are projecting an overspend of £606,000 at month 4. Primary areas of overspend/shortfalls include an £84,000 shortfall in fees in achieving capital receipts, £190,000 shortfall within investment and non-operational estate income (including £72,000 reduction in St Davids 2 rental income) as well as projected overspends on Old Library (£183,000) and Tennis Centre (£213,000).
6. Sport, Leisure and Development is reporting a potential £272,000 overspend. The largest factor is shortfall of income at CIWW, in some part due to the closure of the Flowrider on building safety issues, as well as increased energy costs, albeit

this overspend is partly offset by reduced staffing costs. An income shortfall at Channel View Centre is currently being offset by a projected underspend against policy growth item, with delayed recruitment of Youth Sport Inclusion officers resulting in a projected £50,000 underspend which is reflected within this position.

7. The Major Projects £217,000 overspend projection is linked to the NHS lease of Toys R Us building expiring in October (£117,000), after which the Council will be responsible for holding costs (NNDR rates, security etc) of the building in 2022/23, as well as circa £100,000 of unbudgeted expenditure projections relating to funding of a project manager post and internal support recharges agreed by Major Projects.
8. All other divisions within Economic Development are projecting balanced or underspend positions for 2022/23.
9. Against the £498k savings target with circa £306,000 of savings projected to be fully achieved, whilst savings of £192,000 in Building Maintenance efficiency (£82,000), reduction in agency and employee costs at Cardiff Castle (£30,000) and income targets in Property Estates (£80,000) are currently projected to be unachievable, leaving a total £192,000 shortfall against savings targets for 2022/23.
10. Full spend of £550,000 is currently forecast against two FRM items in 2022/23, whilst all policy growth proposals (£737,000) are progressing well, with £555,000 of growth proposals either in place or anticipated to be in place imminently, with a partial underspend of £192,000 in 2022/23 largely due to staff not being recruited to posts until part way through the year.

### **Recycling & Neighbourhood Services +£389,000**

11. The Recycling & Neighbourhood Services directorate is currently projecting an overspend estimated at £389,000.
12. The Policy Growth and FRM allocations to fund various waste and cleansing initiatives will be fully spent.
13. The Service is projected to achieve the full £262,000 budget savings for 2022/23.
14. Significant pressures are evident in Collections with a further overspend in Environment Enforcement. There is a substantial underspend in Recycling Treatment and Waste Disposal with further savings in Management & Support and Waste Strategy. Balanced positions are forecast in Cleansing and Trade Waste.
15. The Collections overspend is £1,662,000 and reflects higher staff costs caused by greater levels of sickness which requires agency cover and overtime to ensure service continuity. There is also increased vehicle costs, in particular the inflationary impact of fuel costs. In addition, there are additional costs associated with the evolving and proposed expansion of the segregated recycling trial.

16. The overspend in Environmental Enforcement is £105,000 caused by a short-term extension to temporary staff contracts until a proposed restructure is introduced.
17. Recycling Treatment is reporting an underspend of £975,000 reflecting an increase in the market price received from the sale of recyclable material and improved quality of material following improvements made at the Recycling Centres. The market is very open to price volatility and this projection is based on existing income levels and likely scenarios for the remainder of the year. There is a further underspend of £220,000 in Waste Disposal costs reflecting reduced volumes of residual waste and £183,000 in Management & Support and Waste Strategy due to the holding of vacant posts and an uncommitted project budget.

### **Education & Lifelong Learning +£5.424 million**

18. The month four position for the Education & Lifelong Learning directorate reflects an overspend of £5.424 million. Schools Transport is projecting an overspend of £2.593 million reflecting the full year effect of 2021/22 new routes and price increases, along with anticipated increases in ALN routes in 2022/23, and the extraordinary contractor price increases expected to be applied during 2022/23 in response to the recent fuel price increases. This position includes use of ALN covid grant (£484k) and 2021/22 WLGA grant funding (£594k).
19. Out of Area Placements is £839,000 overspent due to an increase in provision required from 245 to 276 pupils in total. Services to Schools includes an overspend of £1.422 million on Schools Catering Services due to price increases relating to food and transport costs as well as reduced income from paid school meals.

### **Housing & Communities (£317,000)**

20. The Housing & Communities directorate is reporting an overall underspend of £317,000 at Month 4. This comprises overspends totalling £399,000 across Business Performance & Support £217,000, Homelessness and Hostels £43,000, Housing Strategy and Service Development £61,000 and Hubs & Community Services £78,000, offset by underspends totalling £716,000 across all other areas of the service.
21. The Business Performance and Support overspend of £217,000 relates mainly to PPE distribution costs across the authority which are currently under review, partly offset by vacancy savings.
22. The £43,000 overspend within Homelessness and Hostels is due to premises costs at the Housing Options centre whilst Housing Strategy and Service Development overspend of £61,000 relates to ongoing delays in a planned restructure linked to a prior year saving.
23. Hubs and Community services overspend of £78,000 is linked to overspends of £222,000 within Day centres due to an unachieved vacancy provision now centres have fully reopened, additional CCTV costs due to break-ins and vandalism and

additional vehicle costs. Learning for Life is projecting an overspend of £19,000 due to a shortfall in income at Llanover Hall. These are partly offset by in year savings of £163,000 across Hubs and Day Opportunities relating to staff recharges and employee savings.

24. In Advice and Benefits, an underspend of £348,000 relates mainly to FRM funds awarded to support activity within Into Work Services as a result of grant fallout. Additional grant income for the Young Persons Gateway has since been allocated and is now supporting the activity, releasing £259,000 of the original FRM funding. In addition, £89,000 net administration income from various cost of living support schemes is projected after negating all associated expenditure.
25. Within Neighbourhood Regeneration an underspend of £158,000 is reported following delays to the planned restructure which is currently assumed to be in place by 1<sup>st</sup> October.
26. Housing Projects are reporting an underspend of £210,000 owing to delays in the planned restructure which is also expected to be in place by 1<sup>st</sup> October.
27. Early Help and Partnership and Delivery are both reporting a balanced position at month 4.

#### **Performance & Partnerships (£81,000)**

28. The Performance and Partnerships position comprises of underspends due to held vacancies and projected income exceeding targets in the Cabinet Office and Performance Management and Bilingual Cardiff divisions.

#### **Children's Services +£8.950 million**

29. Children's Services is currently projecting an £8.950 million overspend. The majority of this overspend (£5.961 million) relates to residential placements, which includes a net savings target of £2.643 million. Children within external residential placements has remained around 100 throughout the year to date and although work continues to step down placements where appropriate the additional demand has resulted in placement numbers remaining high. The external fostering budgets are reporting a £1.120 million underspend reflecting the complexity of need alongside a reduction in the independent fostering agency market.
30. Additional bespoke placements due to complexity of needs and limited spaces available in the residential market have created a further overspend within the directorate to the sum of £4.067 million. There have been 34 of these placements to date with 14 active cases. These projections are based on current numbers and costs assumed for the remainder of the year unless step down is guaranteed. It also includes an estimated £1.547 million of Health contributions. This area is monitored closely on a case-by-case basis and where possible and prioritised for step down when appropriate.

31. Further overspends include £1.295 million in relation to CHAD domiciliary care packages and £265,000 for legal disbursements.
32. The position at Month 4 assumes use of £1.180 million of Children's Contingency to deal with the cost differential of agency staff versus full time staff. This results in £1.320M of the corporate contingency remaining, along with £600,000 remaining in an earmarked reserve for Children's services staffing. Several external grants have been identified and bids have been made, if successful these will be brought into the monitoring position on receipt of grant award letters.

### **Adult Services (£123,000)**

33. Adult Services is projecting a £123,000 underspend at Month 4. This comprises a £1.049 million overspend on commissioned care, which is offset by a £1.172 million underspend on Internal Services.
34. The position on commissioned care comprises a £380,000 overspend on Older People, a £431,000 overspend on Mental Health and a £295,000 overspend on Substance Misuse. These are offset by a projected £57,000 underspend on Learning Disabilities, whilst Physical Disabilities is projecting a balanced position.
35. The largest contributory factors to the position on Older Peoples' Services are overspends on respite and domiciliary care. Respite costs are difficult to predict, and the position will be kept under review as the year progresses. The overspend on domiciliary care is a combination of additional care costs and lower than budgeted income. Increased numbers of residential and nursing placements are the main factor in Substance Misuse and Mental Health overspends, with the partial achievement of in-year savings a further factor in relation to the latter.
36. The £1.172 million underspend on Internal Services is a combination of a £479,000 underspend in Assessment and Care Management, a £311,000 underspend in Reablement and Independent Living and a £475,000 underspend in Support and Performance Management. These underspends are partially offset by a £93,000 net overspend in Internal Learning Disability Services, which is attributable to the delayed implementation of a 2021/22 saving proposal. The underspends in all other areas of Internal Services are attributable to a level of vacancies, and the fact that funds allocated to support restructure will only be partly used in the current year.

### **Planning, Transport & Environment +£430,000**

37. The Month 4 position shows a forecast overspend of £430,000.
38. The Policy Growth and FRM allocations to assist with the delivery of One Planet Cardiff, to fund infrastructure and community improvements and the funding for Taxi Grants are projected to be fully spent at this time.

39. The Service is projected to achieve the full £201,000 budget savings for 2022/23.
40. In-year pressures are evident within Highway Infrastructure, Transport and Planning & Building Control whilst Energy Management is forecasting a surplus. Bereavement, Registration, Dogs Home and Management and Support are showing balanced positions.
41. Highway Infrastructure is forecasting an overspend of £292,000 and includes inflationary increases for electricity and fuel. In addition, there is an inherent funding shortfall in the provision of the Winter Maintenance programme. The benefit from the installation of LED street lighting has helped to partly mitigate the pressures. Transport is forecasting an overspend of £214,000 reflecting the additional cost of providing Hostile Vehicle Mitigation measures and an income shortfall in Street Work activities. An anticipated shortfall in planning fees, partly offset by additional property search fees is forecast to result in an overspend of £162,000. Energy Management are forecasting a surplus of £238,000 reflecting a significant increase in income generated by the Lamby Way Solar Farm which is offsetting the continued lower performance at the Radyr Weir Hydro facility.

#### **Governance & Legal Services +£400,000**

42. The Governance and Legal position comprises of an overspend in Legal Services of £455,000, primarily due to projected locum solicitor costs of £375,000 as recruiting to short term vacancies continues to prove difficult, and unachieved legal income targets. The legal position is being partly offset by an underspend within Democratic Services due to the holding of vacant posts.

#### **Resources (£205,000)**

43. The Resources position comprises of an underspend in Human Resources of £300,000 and £40,000 in Finance and £10,000 in Commissioning and Procurement, primarily due to holding vacant posts for the remainder of the financial year. The Chief Digital Officer is reporting an overspend of £145,000 overspend is due to an under recovery of income that is partially offset by vacant posts within Customer Services, and increasing cost of supplies and services within ICT.

#### **Cardiff Harbour Authority**

44. For the current year, the Council worked with the Welsh Government to identify budget pressures around increases in material costs, contractors and energy prices as well as historical shortfalls in service level agreement budgets. In addition, work has been conducted to identify future obsolescence and compatibility issues with existing systems and equipment requiring upgrades or replacement. These budget pressures are partly offset by savings due to achievable efficiencies against the approved Fixed Costs budget of £5.374 million.



The Asset Renewal funding requirement for non-critical assets is £430,000, plus £117,000 from the ten-year asset management programme to replace any critical assets. This gives an overall budget for the Cardiff Harbour Authority (CHA) of £5.921 million, which is an increase of 2.6% on the final award total for the 2021/22 financial year.

45. The forecast at the end of quarter one indicates a funding requirement of £5.921 million, representing a full spend of budget.

	<b>Budget £000</b>	<b>Outturn £000</b>	<b>Variance £000</b>
Expenditure	6,332	6,369	37
Income	(958)	(995)	(37)
<b>Fixed Costs</b>	<b>5,374</b>	<b>5,374</b>	<b>0</b>
Asset Renewal	547	547	0
<b>Total</b>	<b>5,921</b>	<b>5,921</b>	<b>0</b>

46. The position includes increased costs on dredging and barrage maintenance, largely due to further significant cost price pressure on contractor supplies and works, offset by reduced expenditure on facilities management, community liaison and environmental areas. Increased income against target is forecast on car parking. This forecast will be updated as more information becomes available over the coming months.
47. The Asset Renewal budget is currently indicating a full spend in line with the revised approved schedule of work, including boardwalk replacement scheme and barrage Scada ABB control system upgrade.
48. The CHA maintains a Project and Contingency Fund, which is used to support projects and provides a contingency for situations where the approved budget is exceeded. The Fund receives contributions from a combination of receipts from the sale and disposal of land and a share of past year underspends on the Fixed Cost budget. The balance on 31 March 2022 was £104,000 and this is in line with the amendments to the Deed of Variation as agreed in March 2021.

### **Civil Parking Enforcement**

49. Civil Parking Enforcement (CPE) manages parking, parking enforcement and moving traffic offences throughout the city. The income from these activities is used to support the operational costs with the surplus being transferred to the Parking and Enforcement Reserve.
50. The budget was set using various assumptions and scenarios. The table below provides a summary of the budget and projected outturn position.

	<b>Budget £000</b>	<b>Outturn £000</b>	<b>Variance £000</b>
<b>Income</b>			
On street car parking fees	4,839	3,846	993
Off street car parking fees	1,092	1,042	50
Resident's parking permits	473	473	0
Penalty charge notices	1,933	2,289	(356)
Moving Traffic Offences (MTO's)	4,050	4,270	(220)
Other Income	48	48	0
<b>Total Income</b>	<b>12,435</b>	<b>11,968</b>	<b>467</b>
<b>Expenditure</b>			
Operational costs, parking & permits	597	608	11
Enforcement service including TRO	6,142	5,905	(237)
<b>Total Expenditure</b>	<b>6,739</b>	<b>6,513</b>	<b>(226)</b>
<b>Annual Surplus / (Deficit)</b>	<b>5,696</b>	<b>5,455</b>	<b>241</b>

51. The current projection indicates an annual trading surplus of £5.455 million. This is £241,000 lower than the budget reflecting lower income partly offset by reduced operating costs.
52. Income is forecast at £11.968 million which is £467,000 lower than budgeted. Reduced activity partly caused by road closures to facilitate city centre events and delays in project implementation will result in lower car parking fees although there is an anticipated increase in the income generated from PCN's and MTO's.
53. The lower expenditure of £226,000 reflects a reduction in loan repayments for invest to save schemes following full repayment in the previous financial year.
54. The surplus of £5.455 million is transferred to the Parking and Enforcement Reserve and available to support highway, transport and environmental improvements.
55. The table below illustrates the forecast position in the reserve:

<b>Parking &amp; Enforcement Reserve</b>	<b>£000</b>
<b>Balance 1<sup>st</sup> April 2021</b>	<b>1,985</b>
Contribution from CPE	5,455
<b>Total Available</b>	<b>7,440</b>
Contribution to support revenue budget	(5,935)
Approved project support and initiatives	(581)
Additional support	(183)
<b>Balance 31<sup>st</sup> March 2023</b>	<b>741</b>

56. The brought forward balance in the reserve is £1.985 million. The CPE position indicates a surplus of £5.455 million. The contribution to the revenue budget to fund infrastructure maintenance and improvements is £5.935 million. A further £581,000 will support various initiatives such as Active Travel and LDP transport monitoring approved in the budget plus an additional £183,000 towards match-funding for bollard removal scheme in St. Mary Street and Womanby Street and a provision for various transport scoping works such as the Metro. The year-end balance is forecast at £741,000.

#### **Housing Revenue Account (£587,000)**

57. The Housing Revenue Account (HRA) is projecting a potential surplus of £587,000.

58. A major variance is in relation to premises costs overspends at the community hubs and hostels/other accommodation with increased forecasts for utility costs (estimated at £778,000 above budget) reflecting the current market and corporate purchasing arrangements.

59. An anticipated £688,000 underspend on capital financing costs is due to the impact on debt repayment and external interest charges of the 2021/22 reduced borrowing requirement. Other reported variances include rent and service charge income above target and employee savings across the functions of £342,000.

60. The Housing Repairs Account is forecasting an overall balanced position. Underspends include responsive repairs estimated at £211,000, electrical testing of £120,000 and management and administration vacancy savings of £96,000. These underspends are partly offset by estimated void property repairs overspends of £427,000. The external painting and disabled facilities grant budgets indicate balanced budgets at this time.

61. Based on week 13 statistics, standard rent and service charge income are forecasted at £619,000 above target. This is mainly in relation to a lower than budgeted void rent loss as well as a reduced bad debt provision requirement and rental and service charge income above target. Hostels and other accommodation income forecasts include a shortfall of £128,000 in relation to rents. Some delay has been experienced in terms of the planned timings for letting of units at a new build housing project and there is a Housing Support Grant shortfall of £185,000.

62. The balance of the overall variance is mainly due to underspends on supplies and services.
63. There are a number of forecasts which due to the nature of the spend and income and the number of variables is subject to change and will need to be reviewed in detail over the coming months.
64. The Month 4 position does not include any assumptions over and above the already budgeted pay award of 3% for 2022/23. Current pay negotiations are ongoing and the outcome of any settlement reached will be reflected in future monitoring reports.
65. The surplus is assumed at this stage to transfer to earmarked reserves as appropriate to further improve financial resilience and to offset future years budget pressures.

Directorate Saving Proposals - 2022/23

Dir	Ref	Description	Efficiency Savings				Savings Progress			
			Employees	External/Other	Income	Total Proposed	Achieved £'000	Projected £'000	Unachieved £'000	NOTES
			£000	£000	£000	£000				
CMT	CMT E1	<b>Past Service Contributions</b> A review of past service contributions to pension funds in respect of ex-employees has identified savings of £49,000.	49	0	0	49	12	49	0	Current projections indicate the saving will be saved in full.
	<b>Corporate Management Total</b>			<b>49</b>	<b>0</b>	<b>0</b>	<b>49</b>	<b>12</b>	<b>49</b>	<b>0</b>
Economic Development	ECD E1	<b>Electricity efficiency saving</b> A 10% efficiency in electricity usage in County Hall and City Hall.	0	58	0	58	19	58	0	Quarter 1 indicates that the efficiency of usage target can be achieved compared to 2019/20.
	ECD E2	<b>Building Maintenance efficiency saving</b> Efficiency in building maintenance at County Hall and City Hall.	0	82	0	82	0	0	82	Not projected to be achieved as costs are substantially higher in the first quarter than in previous years. The situation will have to be closely monitored as the year progresses.
	ECD E3	<b>Cardiff Castle</b> A combination of reduced agency and employee spend.	30	0	0	30	0	0	30	Not projected to be achieved as Employee costs are greater in first quarter of 22/23 than 21/22
	ECD E4	<b>Shared Regulatory Services</b> A reduction in Cardiff's contribution to Shared Regulatory Service, linked to business administration arrangements.	0	86	0	86	29	86	0	Achieved through reduction in agreed payment to the SRS.
	ECD E5	<b>Culture, Venues and Events</b> Efficiencies across the division - printing, stationery etc.	0	5	0	5	2	5	0	Projected to be fully achieved
	ECD E6	<b>Staffing Efficiencies in Sports and Leisure</b> The reduction of 1 FTE through voluntary redundancy.	50	0	0	50	50	50	0	Saving achieved, post holder VS in October 2021
	ECD I1	<b>Increase in Income - Workshops</b> Review of income target in line with levels of income currently being achieved.	0	0	37	37	12	37	0	Projected to be fully achieved
	ECD I2	<b>Increase in Income - Property Estates</b> Planned increase in income through review of rent levels on lease renewal.	0	0	110	110	10	30	80	Partially achieved. New leases / rent reviews have been delayed.
	ECD I3	<b>Parks Management / Operations Restructure.</b> Expanding income generation activities alongside a staff restructure within management and operational staff to meet service demands.	(25)	0	45	20	6	20	0	Projected to be fully achieved
	ECD I4	<b>Increase in income - Outdoor Sport and Cardiff Riding School</b> Income budget increase in line with anticipated revenue from increase in fees and charges for 2022/23.	0	0	11	11	4	11	0	Projected to be fully achieved
	ECD I5	<b>Increase income - Landscape Design Service</b> Increase fee earning target for the Parks Design Function	0	0	9	9	3	9	0	Projected to be fully achieved
	<b>Economic Development Total</b>			<b>55</b>	<b>231</b>	<b>212</b>	<b>498</b>	<b>135</b>	<b>306</b>	<b>192</b>
Neighbourhood Services	RNS E1	<b>Cleansing, Enforcement &amp; Strategy Redesign</b> A redesign of management structure with no associated impact on frontline services.	60	0	0	60	60	60	0	This saving has been achieved in full.

Recycling & Neighbourhood	RNS I1	<b>Realign Income Budgets</b> Income budget increase in line with increased activity at Bessemer Commercial Site and other services.	0	0	172	172	43	172	0	It is anticipated that these savings will be achieved in full.
	RNS I2	<b>Review of existing Income targets - Cleansing</b> Income budget increase in line with increased activity from SWTRA and City Centre.	0	0	30	30	0	30	0	It is anticipated that these savings will be achieved in full.
<b>Recycling and Neighbourhood Services Total</b>			<b>60</b>	<b>0</b>	<b>202</b>	<b>262</b>	<b>103</b>	<b>262</b>	<b>0</b>	
Education	EDU E1	<b>Further reduction in number of private early years places purchased</b> With fewer pupils expected to enter the primary phase it is anticipated that the need for additional places in private nursery settings will reduce, as numbers should be able to be accommodated within LA nursery capacity.	0	35	0	35	12	35	0	Private nursery settings have reduced with full savings projected for the year.
	EDU E2	<b>Continued vacancy management</b> Maintain current staffing commitment and not appoint to vacant posts.	30	0	0	30	11	30	0	Sufficient vacancies within the directorate to provide the savings target. Expected to be achieved.
	EDU E3	<b>SOP Programme</b> Maximise the opportunity to fund salary costs, where appropriate, through the SOP model rather than existing revenue budgets.	200	0	0	200	0	200	0	Currently under review but planned to be achieved in full through recharge of salaries to capital projects at yearend.
	EDUE4 I1	<b>Use of LA Annex funding from Central South Consortium</b> Increase income budget to reflect current levels of funding received from CSC.	0	0	45	45	0	45	0	Central South Consortium funding yet to be received but is expected in full.
<b>Education Total</b>			<b>230</b>	<b>35</b>	<b>45</b>	<b>310</b>	<b>23</b>	<b>310</b>	<b>0</b>	
Planning, Transport and Environment	PTE E1	<b>Street Lighting Energy Initiatives</b> Continuation of the implementation of the LED & dimming regime across entire Street Lighting network, which is resulting in decreased energy usage.	0	40	0	40	10	40	0	It is anticipated that these savings will be achieved in full.
	PTE E2	<b>Highways - Electrical Team</b> Reduced reliance on Street Lighting structural & electrical testing revenue budgets due to Capital investment in new infrastructure.	0	15	0	15	4	15	0	It is anticipated that these savings will be achieved in full.
	PTE E3	<b>Staffing Efficiencies across PTE</b> Deletion of posts that equate to 2.4 FTE reduction in the directorate.	41	0	0	41	41	41	0	This saving has been achieved in full.
	PTE I1	<b>PTE - General Fees &amp; charges</b> Additional income through increases to a number of fees & charges in respect of highways and transportation.	0	0	10	10	3	10	0	It is anticipated that these savings will be achieved in full.
	PTE I3	<b>Building Control- Supplemental charging for Property Searches</b> Additional income through recently introduced Land Search fees.	0	0	60	60	60	60	0	This saving has been achieved in full.
	PTE I4	<b>Road Safety Team</b> Improve recharging & full cost recovery to Grant funded schemes.	0	0	10	10	3	10	0	It is anticipated that these savings will be achieved in full.
	PTE I5	<b>Transport Policy - Review basis of recharging to Grant funded schemes</b> Improve recharging & full cost recovery to Grant funded schemes.	0	0	25	25	2	25	0	It is anticipated that these savings will be achieved in full.
<b>Planning, Transport and Environment Total</b>			<b>41</b>	<b>55</b>	<b>105</b>	<b>201</b>	<b>123</b>	<b>201</b>	<b>0</b>	

P&C - Performance and Partnerships	P+PI1	<b>Media &amp; Communications - Increased income</b> An increased income target for the design team in line with performance over 2019/20 & 2020/21.	0	0	30	30	10	30	0	It is anticipated that these savings will be achieved in full.
	P+PI2	<b>Cardiff Research Centre - Increased income</b> An increased income target for Cardiff Research Centre in line with performance in 2020/21.	0	0	20	20	0	20	0	It is anticipated that these savings will be achieved in full.
	P+PI3	<b>Bilingual Cardiff - Increase external income</b> Align budget in line with the external income currently being achieved.	0	0	25	25	7	25	0	It is anticipated that these savings will be achieved in full.
	P+PE1	<b>Policy &amp; Partnerships - Efficiency</b> A reduction in the policy initiatives budget and the deletion of a vacant post.	26	8	0	34	29	34	0	It is anticipated that these savings will be achieved in full.
<b>People and Communities - Performance and Partnerships Total</b>			<b>26</b>	<b>8</b>	<b>75</b>	<b>109</b>	<b>46</b>	<b>109</b>	<b>0</b>	
People & Communities - Housing and Communities	HAC E1	<b>Review of Central Hub staffing linked to alignment of Advice Service</b> Alignment of advice services and a relocation of teams resulting in a reduction of staffing required at the Central Hub.	60	0	0	60	43	17	0	Associated posts were deleted and the full saving will be realised from 1.10.22 when employee leaves on voluntary severance.
	HAC E2	<b>Universal Credit roll out - reduction in benefit administration</b> As Universal Credit continues to be rolled out the caseload of Housing Benefit continues to reduce, thus reducing the workload of assessors. The saving reflects the reduction of 4 FTE plus savings on overtime. The figure reflects some of the staffing savings being a part year only in 2022/23 .	109	46	0	155	91	64	0	This saving has been achieved through turnover of staff and overtime budget is being managed and projected saving is due to be achieved.
	HAC E3	<b>Restructure of Strategy &amp; Housing Need management team</b> A proposed restructure resulting in the net reduction of 1 Grade 10 post and a reduction in hours. The saving is a part year figure, estimated to commence in July 2022.	39	0	0	39	20	19	0	This saving is projected to be achieved in full once the planned voluntary severance has taken place.
	HAC E4	<b>Digital Efficiencies - increase use of scan stations in Hubs and Hybrid Mail</b> To increase the use of scan stations in the Hubs and use of hybrid mail resulting in staffing efficiencies. The saving reflects a mini-restructure together with review of HRA contributions.	60	0	0	60	60	0		The planned restructure and voluntary severance has taken place and the saving has been realised in full
	HAC I1	<b>Realignment of Estate Management Costs</b> Reflecting appropriate HRA contributions to post funding.	0	0	68	68	68	0		The HRA contribution has been agreed and saving has been achieved in full
<b>People and Communities - Housing and Communities Total</b>			<b>268</b>	<b>46</b>	<b>68</b>	<b>382</b>	<b>282</b>	<b>100</b>	<b>0</b>	
ices	ADU E1	<b>Mental Health Services, increasing accommodation and support</b> The development of new housing projects to step people down from more expensive mental health provision options.	0	150	0	150	0	75	75	Part year savings expected in 2022/23 - reflects move-in times to the new housing project. The unachieved component is a delay and will be achieved in subsequent years.
	ADU E2	<b>Older Persons- use of extra care for reablement and respite</b> The use of recently commissioned respite /reablement space within Llys Enfys as an alternative to care home provision.	0	57	0	57	0	0	57	This saving is not achieved
	ADU E3	<b>Learning Disabilities, increasing accommodation and support</b> The development of new supported living arrangements to enable step down from more expensive options.	0	100	0	100	40	119	-19	A slight over-achievement of savings target is anticipated.

People and Communities - Adults' Ser	ADU E4	<b>Mental Health - Increase use of Shared Lives /Adult Placements as an alternative to care home /supported living.</b> The potential to increase the availability of Adult Placements for those with Learning Disabilities, mental health and dementia.	0	27	0	27	0	0	27	This saving is not achieved
	ADU E5	<b>Older Persons - Utilisation of Occupational Therapists / Investment in Review Arrangements</b> Strengthen the review process in Adult Services to include Occupational Therapist input, building on the approach taken in the Independent Living Service to review double handed care packages.	0	102	0	102	0	102	0	Working with directorate re: impact of package review.
	ADU I1	<b>Adult Mental Health - Health Contribution</b> Ensuring appropriate contributions from Health towards the cost of care packages.	0	0	125	125	30	125	0	It is anticipated that these savings will be achieved in full.
	ADU I2	<b>Mental Health Services for Older People - Health Contribution</b> Ensuring appropriate contributions from Health towards the cost of care packages.	0	0	175	175	44	175	0	It is anticipated that these savings will be achieved in full.
	ADU I3	<b>Learning Disabilities - Health Contribution</b> Reflecting contributions from Health towards the cost of care packages.	0	0	100	100	25	100	0	It is anticipated that these savings will be achieved in full.
<b>People and Communities - Adults' Services Total</b>			<b>0</b>	<b>436</b>	<b>400</b>	<b>836</b>	<b>139</b>	<b>696</b>	<b>140</b>	
People and Communities - Childrens' Services	CHD E1	<b>Shifting the balance of Care : Review Hub</b> The implementation of the review hub is expected to increase intervention and provide earlier support to children, young people and their families leading to stepping down of Care and Support cases where appropriate, resulting in a reduction in associated costs.	0	319	0	319	108	319	0	Reviewing hub now in place. Savings indicated include previous placements that have been reassessed or stepped down. However, increasing price pressures and demand has resulted in a net overspend position in residential and bespoke placements.
	CHD E2	<b>Workforce</b> Improve recruitment and retention of permanent staff will reduce the reliance on more costly agency arrangements.	84	0	0	84	0	84	0	No budget savings possible so far this year and unlikely to be achieved due to the additional workload from placement programme.
	CHD E3	<b>Shifting the balance of Care : Appropriate placement finding</b> Reduction in placement costs through appropriate use of Falconwood Assessment Centre, increased in-house fostering, supported lodgings and kinship placements. Prioritisation of independent fostering for children with the highest needs (parent and baby/complex needs), alongside enhanced step down services.  The saving is net of the pump-prime budget to fund the additional workforce required internally.	0	2,240	0	2,240	750	2240	0	Savings projected include residential placements stepped down through Young Persons Gateway, Fostering and those returned home. Latest figures suggest 32 cases have been stepped down. However, increasing price pressures and demand has resulted in a net overspend position in residential and bespoke placements.
<b>People and Communities - Children Services Total</b>			<b>84</b>	<b>2,559</b>	<b>0</b>	<b>2,643</b>	<b>858</b>	<b>2,643</b>	<b>0</b>	
RES	RES E2	<b>Reducing the net budget of the Information Governance Function</b> Management of vacant posts within Information Governance.	22	0	18	40	10	40	0	Currently vacant posts being managed
	RES E3	<b>Realigning the Finance and Accountancy function and an income review of the service.</b> A restructure of the Accountancy Function and realignment of resources across Finance, focusing on establishing professional posts so that the service continues to deliver a high quality service, whilst identifying sustainable funding.	28	0	50	78	20	78	0	Currently resources being managed within budget across Finance and Accountancy.



	RES 11	<b>Reducing the net budget of the Revenues Function</b> Maximising the income funding that is being collected by Revenues and ensuring that a proportion of this amount is allocated to the services inspecting, collecting and recovering.	0	0	150	150	33	150		Current projections indicate saving will be achieved in full.
<b>Resources Total</b>			<b>50</b>	<b>0</b>	<b>218</b>	<b>268</b>	<b>63</b>	<b>268</b>	<b>0</b>	
<b>Council Total</b>			<b>863</b>	<b>3,370</b>	<b>1,325</b>	<b>5,558</b>	<b>1,784</b>	<b>4,944</b>	<b>332</b>	

Mae'r dudalen hon yn wag yn fwiadol

**CARDIFF COUNCIL CAPITAL PROGRAMME 2022-2023**

Tudalen 765

<u>DIRECTORATE &amp; SCHEME</u>	2022-2023 Programme	2021-22 Slippage	Budget Revision	Virements	Changes & New Approvals	Total Programme 2022-23	Projected Outturn	Slippage	(Underspend) / Overspend	Total Variance
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
<b><u>ECONOMIC DEVELOPMENT</u></b>										
<b><u>Business &amp; Investment</u></b>										
1	Town Centre Loan Scheme	0	0	0	0	0	0	0	0	0
2	S106 Schemes	54	50	(50)	0	0	54	51	(3)	(3)
	<b>Total Business &amp; Investment</b>	<b>54</b>	<b>50</b>	<b>(50)</b>	<b>0</b>	<b>0</b>	<b>54</b>	<b>51</b>	<b>(3)</b>	<b>(3)</b>
<b><u>City Development &amp; Major Projects</u></b>										
3	Black Tower Tales	0	15	0	0	0	15	15	0	0
4	Economic Stimulus Support James Street	1,930	0	0	(1,930)	0	0	0	0	0
5	International Sports Village Phase 1 - Land Acquisition	7,400	(9,180)	9,350	1,930	0	9,500	9,500	0	0
6	International Sports Village Phase 2 - Development	2,500	(435)	0	0	0	2,065	500	(1,565)	(1,565)
7	Central Square Public Realm	342	0	0	0	0	342	0	(342)	(342)
8	Indoor Arena	26,300	10,008	0	0	0	36,308	7,000	(29,308)	(29,308)
9	Cardiff East Regeneration Strategy	1,500	247	0	0	0	1,747	1,525	(222)	(222)
	<b>Total City Development &amp; Major Projects</b>	<b>39,972</b>	<b>655</b>	<b>9,350</b>	<b>0</b>	<b>0</b>	<b>49,977</b>	<b>18,540</b>	<b>(31,437)</b>	<b>(31,437)</b>
<b><u>Parks &amp; Green Spaces</u></b>										
10	Asset Renewal Buildings	38	0	0	0	0	38	38	0	0
11	Asset Renewal Parks Infrastructure	140	147	0	0	0	287	287	0	0
12	Play Equipment	290	(109)	0	0	0	181	181	0	0
13	Teen/Adult Informal Sport and Fitness Facilities	200	200	0	0	0	400	40	(360)	(360)
14	Green Flag Park Infrastructure Renewal	100	61	0	0	0	161	161	0	0
15	Roath Park Dam	1,850	(363)	0	0	0	1,487	445	(1,042)	(1,042)
16	Flatholm Island - HLF Project	375	25	0	0	0	400	50	(350)	(350)
17	S106 Funded Schemes	1,423	1,277	(1,277)	0	0	1,423	1,750	327	327
	<b>Total Parks &amp; Green Spaces</b>	<b>4,416</b>	<b>1,238</b>	<b>(1,277)</b>	<b>0</b>	<b>0</b>	<b>4,377</b>	<b>2,952</b>	<b>(1,425)</b>	<b>(1,425)</b>
<b><u>Leisure</u></b>										
18	Pentwyn Leisure Centre Redevelopment	200	1,444	0	0	0	1,644	250	(1,394)	(1,394)
	<b>Total Leisure</b>	<b>200</b>	<b>1,444</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1,644</b>	<b>250</b>	<b>(1,394)</b>	<b>(1,394)</b>
<b><u>Venues &amp; Cultural Facilities</u></b>										
19	Asset Renewal Buildings St Davids's Hall	0	240	0	0	0	240	240	0	0
20	Asset Renewal Buildings New Theatre	0	12	0	0	0	12	12	0	0
	<b>Total Venues &amp; Cultural Facilities</b>	<b>0</b>	<b>252</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>252</b>	<b>252</b>	<b>0</b>	<b>0</b>
<b><u>Property &amp; Asset Management</u></b>										
21	Asset Renewal Buildings	1,317	1,442	0	(107)	0	2,652	1,805	(847)	(847)
22	Community Asset Transfer	(73)	98	0	0	0	25	0	(25)	(25)
23	Investment Property Strategy	0	0	0	0	1,340	1,340	1,340	0	0
24	Cardiff Central Market Regeneration - HLF	50	19	0	0	0	69	40	(29)	(29)
25	Codebreakers Statue	0	0	0	0	173	173	173	0	0
	<b>Total Property &amp; Asset Management</b>	<b>1,294</b>	<b>1,559</b>	<b>0</b>	<b>(107)</b>	<b>1,340</b>	<b>4,086</b>	<b>3,185</b>	<b>(901)</b>	<b>(901)</b>
<b><u>Harbour Authority</u></b>										
26	Harbour Asset Renewal	26	0	0	0	521	547	547	0	0
	<b>Total Harbour Authority</b>	<b>26</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>521</b>	<b>547</b>	<b>547</b>	<b>0</b>	<b>0</b>
<b><u>Recycling Waste Management Services</u></b>										

**CARDIFF COUNCIL CAPITAL PROGRAMME 2022-2023**

<b>DIRECTORATE &amp; SCHEME</b>		<b>2022-2023 Programme</b>	<b>2021-22 Slippage</b>	<b>Budget Revision</b>	<b>Virements</b>	<b>Changes &amp; New Approvals</b>	<b>Total Programme 2022-23</b>	<b>Projected Outturn</b>	<b>Slippage</b>	<b>(Underspend) / Overspend</b>	<b>Total Variance</b>
		<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>
27	Waste Recycling and Collection Review	(815)	815	0	0	0	0	0	0	0	0
28	Waste Recycling and Depot Site Infrastructure	300	216	0	(83)	18	451	451	0	0	0
29	Material Recycling Facility	45	21	0	83	0	149	217	68	0	68
30	Waste Grants Match funding	0	100	0	0	0	100	100	0	0	0
31	Circular Economy Fund Grant	1,000	0	0	0	0	1,000	1,000	0	0	0
32	Rapid Charging Infrastructure	1,000	162	0	0	(979)	183	183	0	0	0
33	Re-Use Shop Cabin (Wastesavers)	0	0	0	0	1	1	1	0	0	0
<b>Total Recycling Waste Management Services</b>		<b>1,530</b>	<b>1,314</b>	<b>0</b>	<b>0</b>	<b>(960)</b>	<b>1,884</b>	<b>1,952</b>	<b>68</b>	<b>0</b>	<b>68</b>
<b>TOTAL ECONOMIC DEVELOPMENT</b>		<b>47,492</b>	<b>6,512</b>	<b>8,023</b>	<b>(107)</b>	<b>901</b>	<b>62,821</b>	<b>27,729</b>	<b>(35,092)</b>	<b>0</b>	<b>(35,092)</b>
<b>EDUCATION &amp; LIFELONG LEARNING</b>											
<b>Schools - General</b>											
<b>Planning &amp; Development</b>											
34	Asset Renewal Buildings	2,302	0	0	0	0	2,302	2,302	0	0	0
35	Asset Renewal Invest to Save	4,000	4,677	0	0	0	8,677	16,000	7,323	0	7,323
36	Suitability / Sufficiency	1,040	0	0	0	0	1,040	1,040	0	0	0
37	Capital Receipts/S106 Funded Schemes	1,273	1,806	(1,806)	0	1,602	2,875	2,875	0	0	0
<b>Total Planning &amp; Development</b>		<b>8,615</b>	<b>6,483</b>	<b>(1,806)</b>	<b>0</b>	<b>1,602</b>	<b>14,894</b>	<b>22,217</b>	<b>7,323</b>	<b>0</b>	<b>7,323</b>
<b>Schools Organisation Planning</b>											
38	21st Century Schools - Band A	0	0	0	0	0	0	450	0	450	450
39	21st Century Schools - Band B	45,190	4,041	0	0	(3,985)	45,246	33,220	(12,026)	0	(12,026)
<b>Total Schools Organisation Planning</b>		<b>45,190</b>	<b>4,041</b>	<b>0</b>	<b>0</b>	<b>(3,985)</b>	<b>45,246</b>	<b>33,670</b>	<b>(12,026)</b>	<b>450</b>	<b>(11,576)</b>
<b>TOTAL EDUCATION &amp; LIFELONG LEARNING</b>		<b>53,805</b>	<b>10,524</b>	<b>(1,806)</b>	<b>0</b>	<b>(2,383)</b>	<b>60,140</b>	<b>55,887</b>	<b>(4,703)</b>	<b>450</b>	<b>(4,253)</b>
<b>PEOPLE &amp; COMMUNITIES</b>											
<b>COMMUNITIES &amp; HOUSING</b>											
<b>Neighbourhood Regeneration</b>											
40	Neighbourhood Renewal Schemes	350	353	0	0	0	703	500	(203)	0	(203)
41	District Local Centres	0	235	0	0	0	235	50	(185)	0	(185)
42	Alleygating	100	98	0	0	0	198	50	(148)	0	(148)
43	Targeted Regeneration Investment Programme Matchfunding	0	801	0	0	0	801	801	0	0	0
44	St Mary Street Improvement Works	0	0	0	0	93	93	93	0	0	0
45	Rhiwbina Hub	0	281	0	107	507	895	895	0	0	0
46	City Centre Youth Hub	(650)	784	0	0	0	134	134	0	0	0
47	Youth Zone - Cowbridge Road West Regeneration	1,000	(98)	0	0	0	902	750	(152)	0	(152)
48	S106 Funded Projects	287	(318)	318	0	0	287	113	(174)	0	(174)
<b>Total Neighbourhood Regeneration</b>		<b>1,087</b>	<b>2,136</b>	<b>318</b>	<b>107</b>	<b>600</b>	<b>4,248</b>	<b>3,386</b>	<b>(862)</b>	<b>0</b>	<b>(862)</b>
<b>Housing (General Fund)</b>											
49	Disabled Facilities Service	4,100	1,172	0	(2)	0	5,270	4,970	(300)	0	(300)
50	Enable Grant	540	0	0	0	115	655	655	0	0	0
51	Independent Living Wellbeing Hub - Displacement	3,500	1,101	0	0	0	4,601	0	(4,601)	0	(4,601)
52	Assistive Living	0	0	0	2	0	2	2	0	0	0
53	Traveller Site Expansion	250	0	0	0	0	250	100	(150)	0	(150)
54	Estate Environmental Improvements	80	3	0	0	0	83	183	100	0	100
<b>Total Housing</b>		<b>8,470</b>	<b>2,276</b>	<b>0</b>	<b>0</b>	<b>115</b>	<b>10,861</b>	<b>5,910</b>	<b>(4,951)</b>	<b>0</b>	<b>(4,951)</b>

**CARDIFF COUNCIL CAPITAL PROGRAMME 2022-2023**

<b><u>DIRECTORATE &amp; SCHEME</u></b>		<b>2022-2023 Programme</b>	<b>2021-22 Slippage</b>	<b>Budget Revision</b>	<b>Virements</b>	<b>Changes &amp; New Approvals</b>	<b>Total Programme 2022-23</b>	<b>Projected Outturn</b>	<b>Slippage</b>	<b>(Underspend) / Overspend</b>	<b>Total Variance</b>
		<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>
<b><u>Flying Start</u></b>											
55	Flying Start	1,000	0	0	0	137	1,137	1,137	0	0	0
56	Moorland Primary	0	500	0	0	0	500	500	0	0	0
57	Childcare	0	204	0	0	0	204	204	0	0	0
<b>Total Flying Start</b>		<b>1,000</b>	<b>704</b>	<b>0</b>	<b>0</b>	<b>137</b>	<b>1,841</b>	<b>1,841</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Total Communities &amp; Housing</b>		<b>10,557</b>	<b>5,116</b>	<b>318</b>	<b>107</b>	<b>852</b>	<b>16,950</b>	<b>11,137</b>	<b>(5,813)</b>	<b>0</b>	<b>(5,813)</b>
<b><u>SOCIAL SERVICES</u></b>											
<b><u>Adult Services</u></b>											
58	Tremorfa Day Services	0	36	0	0	0	36	36	0	0	0
<b>Total Adult Services</b>		<b>0</b>	<b>36</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>36</b>	<b>36</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b><u>Children's Services</u></b>											
59	Accommodation Strategy	0	(18)	18	0	0	0	0	0	0	0
60	Young Persons Gateway Accommodation	0	248	0	0	0	248	100	(148)	0	(148)
61	Residential Provision for Children Looked After	0	500	0	0	0	500	0	(500)	0	(500)
62	Respite - Learning Disabilities behaviour that challenges (Ty Storrie) - Displacement	100	1,135	0	0	0	1,235	200	(1,035)	0	(1,035)
63	Edge of Care Units (*2) - Bringing out of county home - Displacement	0	455	0	0	0	455	455	0	0	0
64	Childrens Assessment Centres - Displacement	0	455	0	0	0	455	0	(455)	0	(455)
65	Safer Accommodation - Displacement	0	695	0	0	0	695	0	(695)	0	(695)
<b>Children's Services</b>		<b>100</b>	<b>3,470</b>	<b>18</b>	<b>0</b>	<b>0</b>	<b>3,588</b>	<b>755</b>	<b>(2,833)</b>	<b>0</b>	<b>(2,833)</b>
<b>Total Social Care</b>		<b>100</b>	<b>3,506</b>	<b>18</b>	<b>0</b>	<b>0</b>	<b>3,624</b>	<b>791</b>	<b>(2,833)</b>	<b>0</b>	<b>(2,833)</b>
<b>TOTAL PEOPLE &amp; COMMUNITIES</b>		<b>10,657</b>	<b>8,622</b>	<b>336</b>	<b>107</b>	<b>852</b>	<b>20,574</b>	<b>11,928</b>	<b>(8,646)</b>	<b>0</b>	<b>(8,646)</b>
<b><u>PLANNING, TRANSPORT &amp; ENVIRONMENT</u></b>											
<b><u>Energy Projects &amp; Sustainability</u></b>											
66	Cardiff Heat Network	4,628	1,550	0	0	0	6,178	6,178	0	0	0
67	Energy Retrofit of Buildings (REFIT - Invest to Save)	0	0	0	0	129	129	129	0	0	0
68	One Planet Strategy small schemes & matchfunding	500	360	0	0	0	860	755	(105)	0	(105)
<b>Total Energy Projects &amp; Sustainability</b>		<b>5,128</b>	<b>1,910</b>	<b>0</b>	<b>0</b>	<b>129</b>	<b>7,167</b>	<b>7,062</b>	<b>(105)</b>	<b>0</b>	<b>(105)</b>
<b><u>Bereavement &amp; Registration Services</u></b>											
69	Bereavement Asset Renewal	95	95	0	0	0	190	190	0	0	0
<b>Total Bereavement &amp; Registration Services</b>		<b>95</b>	<b>95</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>190</b>	<b>190</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b><u>Highway Infrastructure</u></b>											
70	Highway Carriageway - Reconstruction	100	58	0	208	0	366	366	0	0	0
71	Highway Resurfacing	2,300	2,674	0	(1,908)	0	3,066	4,271	1,205	0	1,205
72	Footpaths	760	0	0	0	0	760	1,219	459	0	459
73	Footway Improvements around Highway Trees	125	0	0	0	0	125	125	0	0	0
74	Millennium Walkway	400	(400)	0	0	0	0	0	0	0	0
75	Bridges & Structures	600	902	0	0	0	1,502	950	(552)	0	(552)
76	Street Lighting Renewals	740	384	0	0	0	1,124	324	(800)	0	(800)

Tudalen 767

**CARDIFF COUNCIL CAPITAL PROGRAMME 2022-2023**

Tudalen 768

<b>DIRECTORATE &amp; SCHEME</b>		<b>2022-2023 Programme</b>	<b>2021-22 Slippage</b>	<b>Budget Revision</b>	<b>Virements</b>	<b>Changes &amp; New Approvals</b>	<b>Total Programme 2022-23</b>	<b>Projected Outturn</b>	<b>Slippage</b>	<b>(Underspend) / Overspend</b>	<b>Total Variance</b>
		<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>
77	LED Lighting Residential (Invest to Save)	1,200	773	0	0	0	1,973	1,973	0	0	0
78	Coastal Erosion Scheme Rover Way to Lamby Way	4,000	196	0	0	276	4,472	276	(4,196)	0	(4,196)
79	Flood Prevention Schemes	250	238	0	0	1,472	1,960	1,513	(447)	0	(447)
<b>Total Highway Maintenance</b>		<b>10,475</b>	<b>4,825</b>	<b>0</b>	<b>(1,700)</b>	<b>1,748</b>	<b>15,348</b>	<b>11,017</b>	<b>(4,331)</b>	<b>0</b>	<b>(4,331)</b>
<b>Traffic &amp; Transportation</b>											
80	Asset Renewal Telematics / Butetown Tunnel	300	501	0	0	0	801	801	0	0	0
81	Cycling Development	800	1,941	0	(1,000)	0	1,741	1,000	(741)	0	(741)
82	Road Safety Schemes	335	0	0	0	0	335	335	0	0	0
83	WG Grant Matchfunding	375	136	0	0	0	511	316	(195)	0	(195)
84	WG (Local Transport Fund)	3,000	185	0	0	(630)	2,555	2,370	(185)	0	(185)
85	WG (Road Safety Casualty Reduction)	0	0	0	0	89	89	89	0	0	0
86	WG (Safe Routes in Communities)	600	0	0	0	769	1,369	1,369	0	0	0
87	WG (Active Travel Fund)	10,000	0	0	0	(761)	9,239	9,239	0	0	0
88	WG (20mph Core Allocation)	0	0	0	0	286	286	286	0	0	0
89	WG (Air Quality)	5,000	0	0	0	0	5,000	5,000	0	0	0
90	City Centre Eastside and Canal Phase 1	3,750	21	0	1,500	1,098	6,369	6,369	0	0	0
91	City Centre Transport Schemes Matchfunding	259	(83)	0	1,500	0	1,676	491	(1,185)	0	(1,185)
92	City Centre Transport Impact - Enabling works	1,000	1,500	0	0	0	2,500	1,000	(1,500)	0	(1,500)
93	Moving Offences Enforcement / P&D Equipment	125	0	0	0	(125)	0	0	0	0	0
94	Bus Corridor Improvements	335	139	0	(300)	0	174	174	0	0	0
95	Cardiff West Interchange	0	225	0	0	0	225	25	(200)	0	(200)
96	S106 Funded Schemes	1,202	440	(440)	0	0	1,202	484	(718)	0	(718)
<b>Total Traffic &amp; Transportation</b>		<b>27,081</b>	<b>5,005</b>	<b>(440)</b>	<b>1,700</b>	<b>726</b>	<b>34,072</b>	<b>29,348</b>	<b>(4,724)</b>	<b>0</b>	<b>(4,724)</b>
<b>Strategic Planning &amp; Regulatory</b>											
97	S106 Projects	681	172	(172)	0	0	681	607	(74)	0	(74)
<b>Total Strategic Planning &amp; Regulatory</b>		<b>681</b>	<b>172</b>	<b>(172)</b>	<b>0</b>	<b>0</b>	<b>681</b>	<b>607</b>	<b>(74)</b>	<b>0</b>	<b>(74)</b>
<b>TOTAL PLANNING, TRANSPORT &amp; ENVIRONMENT</b>		<b>43,460</b>	<b>12,007</b>	<b>(612)</b>	<b>0</b>	<b>2,603</b>	<b>57,458</b>	<b>48,224</b>	<b>(9,234)</b>	<b>0</b>	<b>(9,234)</b>
<b>RESOURCES</b>											
<b>Technology</b>											
98	Modernising ICT to improve Business Processes	44	207	0	0	0	251	251	0	0	0
99	ICT Refresh	800	541	0	0	0	1,341	1,341	0	0	0
<b>Total Technology</b>		<b>844</b>	<b>748</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1,592</b>	<b>1,592</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Central Transport Services</b>											
100	Vehicle Replacement - Lease or Buy Phase 1	0	90	0	0	(90)	0	0	0	0	0
101	Vehicle Replacement - Lease or Buy Phase 2	4,700	(2,394)	0	0	0	2,306	2,306	0	0	0
<b>Total Central Transport Services</b>		<b>4,700</b>	<b>(2,304)</b>	<b>0</b>	<b>0</b>	<b>(90)</b>	<b>2,306</b>	<b>2,306</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Corporate</b>											
102	Contingency	200	0	0	0	0	200	200	0	0	0
103	Invest to Save - Small Schemes	500	0	0	0	(500)	0	0	0	0	0
104	City Deal WIF Payment to Region	(6,792)	6,792	0	0	0	0	0	0	0	0
105	Core Office Strategy - Digital Infrastructure	1,450	5,402	0	0	0	6,852	4,000	(2,852)	0	(2,852)
106	Web casting and Infrastructure	0	160	0	0	0	160	160	0	0	0
107	Electric Bus and Infrastructure Grant Scheme - Displacement	0	7,949	0	0	51	8,000	1,600	(6,400)	0	(6,400)
<b>Total Corporate</b>		<b>(4,642)</b>	<b>20,303</b>	<b>0</b>	<b>0</b>	<b>(449)</b>	<b>15,212</b>	<b>5,960</b>	<b>(9,252)</b>	<b>0</b>	<b>(9,252)</b>

**CARDIFF COUNCIL CAPITAL PROGRAMME 2022-2023**

<b><u>DIRECTORATE &amp; SCHEME</u></b>	<b>2022-2023 Programme</b>	<b>2021-22 Slippage</b>	<b>Budget Revision</b>	<b>Virements</b>	<b>Changes &amp; New Approvals</b>	<b>Total Programme 2022-23</b>	<b>Projected Outturn</b>	<b>Slippage</b>	<b>(Underspend) / Overspend</b>	<b>Total Variance</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>
<b>TOTAL RESOURCES</b>	<b>902</b>	<b>18,747</b>	<b>0</b>	<b>0</b>	<b>(539)</b>	<b>19,110</b>	<b>9,858</b>	<b>(9,252)</b>	<b>0</b>	<b>(9,252)</b>
<b>TOTAL GENERAL FUND</b>	<b>156,316</b>	<b>56,412</b>	<b>5,941</b>	<b>0</b>	<b>1,434</b>	<b>220,103</b>	<b>153,626</b>	<b>(66,927)</b>	<b>450</b>	<b>(66,477)</b>
<b><u>PUBLIC HOUSING (HRA)</u></b>										
108 Estate Regeneration and Stock Remodelling	2,650	(2,473)	2,473	0	0	2,650	<b>3,450</b>	800	0	<b>800</b>
109 External and Internal improvements to buildings	19,150	9,166	(9,166)	0	0	19,150	<b>28,245</b>	9,095	0	<b>9,095</b>
110 Disabled Facilities Service	3,000	848	(848)	0	0	3,000	<b>2,700</b>	(300)	0	<b>(300)</b>
111 Housing New Builds & Acquisitions	49,810	32,043	(32,043)	0	0	49,810	<b>46,075</b>	(3,735)	0	<b>(3,735)</b>
<b>TOTAL PUBLIC HOUSING</b>	<b>74,610</b>	<b>39,584</b>	<b>(39,584)</b>	<b>0</b>	<b>0</b>	<b>74,610</b>	<b>80,470</b>	<b>5,860</b>	<b>0</b>	<b>5,860</b>
<b>TOTAL</b>	<b>230,926</b>	<b>95,996</b>	<b>(33,643)</b>	<b>0</b>	<b>1,434</b>	<b>294,713</b>	<b>234,096</b>	<b>(61,067)</b>	<b>450</b>	<b>(60,617)</b>

Tudalen 769

Mae'r dudalen hon yn wag yn fwiadol



## Appendix 5 – General Fund Capital Schemes Update

In February 2022 the Council approved a new General Fund Capital Programme of £156.316 million for 2022/23 and an indicative programme to 2026/27. The budget for the General Fund has since been adjusted to £220.103 million to include actual slippage reported at outturn, incorporation of new grant approvals and confirmation of actual grant awards.

### Economic Development

1. The Directorate Programme for 2022/23 is £53.471 million; with an initial variance of £35.092 million identified and largely attributable to changes in timescales for the Indoor Arena project.

### **Business and Investment**

2. The Council has drawn down repayable loan funding of £6.060 million from Welsh Government for the implementation of town centre regeneration schemes to bring back vacant, underutilised or redundant buildings into beneficial use. There are currently no loan applications approved to proceed in 2022/23, but any new loans approved following a due diligence process will be reported on later in the financial year. It should be noted that all risk in respect to repayable loans remains with the Local Authority so robust security for loans is sought.
3. The Black Tower Tales visitor experience at Cardiff Castle opened in May 2021. With the scheme costing a total of £351,000, there is a remaining budget of £15,000 retained for final snagging works expected during 2022/23.
4. In September 2021, Cabinet agreed to progress the development strategy for the International Sports Village (ISV) by formally terminating an old Development Agreement with Greenbank Partnership Ltd on the waterfront site and agreeing to acquire all the land and assets owned by Greenbank at the ISV. Further land acquisition and associated costs due to be incurred in 2022/23, including for the Ice Arena, are approximately £9.5 million, in addition to £11.180 million incurred in 2021/22. Expenditure on land acquisition is assumed to be recovered from sales of land. Close monitoring and reporting of the timescale and value of receipts will need to be undertaken and reported as part of the Annual Property Plan and future reports to Cabinet to ensure that there is no sustained impact on the Council's borrowing requirement and on the revenue costs of holding the sites. Additionally, £500,000 of expenditure is forecast towards professional fees on the development of a new velodrome within the redesigned ISV.
5. A final business case for the delivery of an Indoor Arena was approved by Cabinet in September 2021. Projected expenditure for 2022/23 is circa £7 million, to include the final tranche of land purchases and commencement of enabling works. The Development and Funding Agreement is due to reach financial close in December 2022, which will allow construction to begin on site. This is later than originally scheduled, which means a significant

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proportion of this year's budget (circa £29 million) will need to be slipped into 2023/24. All expenditure will be covered by the Arena affordability envelope.

6. As part of the agreed Cardiff East Regeneration Strategy, a grant of £1.5 million has been committed towards a partnership with Cardiff University, Football Association of Wales, Cardiff City Football Club and House of Sport Ltd to develop a state-of-the-art sports complex and pitches. A further £25,000 of professional fees towards the wider development is projected. The grant is due to be funded by receipts from land sales, and where expenditure commitments are required to be agreed in advance of land sales and development agreements, the risks of doing so will need to be considered as part of relevant decision-making processes.

## **Parks & Green Spaces**

7. Property Asset Renewal expenditure of £38,000 include changing room works at Blackweir, Hailey Park and Trelai.
8. The Parks Asset Renewal Infrastructure budget for 2022/23 including slippage is £287,000 and is to be used for footpath reconstruction at Brachdy Lane, Bute Park and Grange Gardens. It will also be used for structural works, such as bridge replacement at Cobb Woods, Hendre Lake and wall refurbishment at Insole Court. Subject to design and cost estimates, schemes may need to be prioritised.
9. As well as completion of several projects started in the previous year, design and upgrade works for a number of play area sites will be undertaken using developer's obligations, where available and eligible for use, as well as Council budgets as part of a replacement programme. This includes sites such as Heol Llanishen Fach and Drovers Way.
10. A budget of £400,000 including slippage of £200,000 carried forward has been allocated to improve the condition of multi-use games areas, fitness equipment, BMX tracks and skate parks across the city. A destination skate park is proposed in Llanrumney which is currently the subject of detailed design and an acceptable tender exercise. Pending the outcome of the tender, it is currently assumed that most expenditure will fall in 2023/24.
11. The Green Flag Infrastructure Renewal budget is £161,000 including slippage and is allocated to support the replacement of signage and infrastructure in existing Green Flag parks. Works onsite include footpaths at Grange Gardens.
12. Expenditure of £445,000 is forecast during 2022/23 in relation to Roath Park Dam. Investigatory / modelling works continue, along with a Phase 2 Stakeholder Consultation Exercise, focusing on the detailed design of the scheme. This will be followed by a Cabinet Report confirming requirement, options and scope prior to any submission of a planning application.

13. Following on from the development phase, the Council and partners have been successful in securing Heritage Lottery Funding of up to £645,200 over the medium term towards the restoration of built and natural heritage on Flat Holm Island. This is for the Walk-through Time project, in partnership with RSPB Cymru and the Flat Holm Society, which aims to preserve its heritage, protect its rich wildlife and attract more visitors to the site. Expenditure of £50,000 is projected to be spent on professional fees prior to any tender exercises.

### **Leisure**

14. The redevelopment of Pentwyn Leisure Centre is subject to a business case proposed to be self-financing from land sale receipts and revenue income. The budget for 2022/23 is £1.644 million including slippage, of which approximately £1.4 million is likely to be further slipped into 2023/24, whilst the business case and development agreements are confirmed.

### **Venues and Cultural Facilities**

15. Property Asset Renewal works (£240,000) for St David's Hall include the completion of the fire alarm installation and the building management system. As part of initial necessary works to be undertaken at the New Theatre prior to handover to HQ Theatres, work to the building management system which was started last year is now complete.

### **Property & Asset Management**

16. Property Asset Renewal works for non-school buildings will continue to be developed over the year but include boiler/heating replacement at various locations including Central Library, City Hall, Grangetown Hub and Tremorfa Day Centre. They will also include a ventilation and distribution boards upgrade at the Wales National Tennis Centre and health and safety works at Mansion House, Norwegian Church Centre and Cardiff Castle. £107,000 has been vired towards the wider refurbishment at Rhiwbina Library. Slippage of £847,000 has been assumed into 2023/24 primarily due to further development work being required in larger schemes and the asset renewal work on the school's estate being prioritised.
17. In line with the investment property strategy approved by Cabinet in 2016, a number of additional sites where the Council is the original freeholder and has provided a lease will be acquired with a view to onward disposal or to benefit from regearing of sites. These are subject to completion terms, but an estimate of £1.340 million is assumed as this stage for the year.
18. The Community Asset Transfer budget provides up to £25,000 for improvement works to buildings being taken on by third party organisations. No schemes are currently planned for 2022/23, so the unspent budget will be reprofiled to future years should suitable schemes be identified and approved.

19. In respect of Central Market, subject to successful grant funding, the Council has allocated circa £700,000 over four years to invest in the fabric of the building; improving the appearance, tackling structural issues and enhancing the commercial attractiveness. Expenditure in 2022/23 is estimated at approximately £40,000 on professional fees, with the final grant submission to the Heritage Lottery Fund due in February 2023, at which point a more detailed future spending profile can be compiled.
20. A new statue is to be erected in Cardiff Bay celebrating the Rugby Codebreakers, with grant support from Welsh Government and grassroots fundraising efforts, as well as a £50,000 contribution from the Council. Whilst the scheme is not due to complete until early 2023/24, circa £172,500 of the total cost will be incurred during the current financial year.

### **Harbour Authority**

21. The Harbour Asset Renewal budget approved for 2022/23 is £547,000, to be spent on completing the installation of boardwalk decking and steps and upgrading barrage control equipment in line with its asset management plan.

### **Recycling Waste Management Services**

22. The Capital programme for 2020/21 included an allocation of £815,000 to roll out a separate glass collection scheme. The Council's recycling strategy 2021- 2025 was the subject of consultation with feedback and a phased programme of change to improve recycling performance to be considered for approval by Cabinet. Subject to the implementation costs of the strategy over the period and availability of grant funding, this budget is carried forward and is to be reviewed as part of the budget proposals for 2023/24 and individual business cases for any agreed change actions.
23. The Waste Recycling and Depot Site Infrastructure budget of £451,000 is to be used for a range of infrastructure improvements at depot and recycling sites including health and safety works at the Heavy Goods Vehicle car park and the salt barn hardstanding and to address car park subsidence.
24. The Materials Recycling Facility (MRF) budget of £149,000 includes a virement from the Waste Recycling and Depot Site Infrastructure budget to partially offset a projected additional cost to replace key components to keep the facility operational.
25. A sum of £100,000 Council match funding is included in the Capital Programme to help secure a range of Welsh Government grants such as from the Circular Economy Fund to be bid for during the year where match funding is required. Details of any external grant awards approved will be included in future monitoring reports. No invitations to bid for Ultra Low Emissions Vehicle Transformation Fund to install electric vehicle charging infrastructure in car parks is expected, with wider schemes operating on a regional basis. Any assumed budget is removed from the programme at this stage.

## **Education and Lifelong Learning**

26. The Directorate Programme for 2022/23 is £60.140 million, with a projected variance of £4.253 million identified.

### **Schools - General**

#### *Asset Renewal - Buildings*

27. The Council's asset renewal allocation of £2.302 million in 2022/23 was budgeted for works across the works estate including roof and boiler replacements, fire precaution works, safeguarding of lobbies and kitchen upgrades. An additional £8.677 million was budgeted from the additional £25 million of invest to save funding to address condition, health and safety and additional learning needs within the schools' estate which was approved in 2018/19. This funding is planned to be used flexibly to cover priority works within schools and an additional £7.323 million is anticipated to be drawn down earlier than planned for use in 2022/23.

#### *Asset Renewal – Suitability and Sufficiency*

28. The Suitability and Sufficiency budget of £1.040 million is expected to be fully utilised in 2022/23 on a range of works including security and safeguarding works on boundaries and receptions across the schools' estate, as well as priority Disability Discrimination Act (DDA) adaptations.

### **Schools Organisation Plan – 21<sup>st</sup> Century Schools**

29. Additional works relating to Ysgol Glan Morfa demolition were identified resulting in additional expenditure of £450,000 and to be managed within the Band A financial model.

30. Band B of the 21<sup>st</sup> Century Schools Programme is underway with an original funding envelope of circa £284 million. This is to be funded by a Welsh Government grant award with match funding from Cardiff Council at a rate determined by the type of school. The new Willows project has returned to the Band B programme due to progress of the project, with Cathays High remaining a Mutual Investment Model (MIM) scheme.

31. Works at Fitzalan High have a Welsh Government approved overall budget of £64.3 million. Expenditure on the project in 2022/23 is estimated to be £23.988 million of which £5.670 relates to the final grant payment from Welsh Government.

32. The Fairwater Campus scheme includes three schools (Cantonian, Riverbank and Woodlands) relocated onto one shared campus. A full business case is due to be submitted to Welsh Government in September with expenditure on planning, surveys and professional fees underway and enabling works to commence with tender to be awarded shortly.

33. Two land acquisitions took place in 2020/21 costing £15.926 million in preparation for the Willows project. This was funded by Welsh Government in addition to the original Band B envelope but will attract the same level of Cardiff Council match funding as other secondary schools, - 35% of the overall funding. The outline business case has been submitted to Welsh Government and is awaiting final sign off.
34. Other Band B schemes currently underway include St Mary the Virgin, Greenhill and the Court Special School. These schemes are currently incurring costs in relation to planning, surveys and professional fees which are funded through Band B Invest to Save funding prior to Welsh Government full business case sign off.

### **People & Communities**

35. The Directorate Programme for 2022/23 is £20.574 million with a variance of £8.646 million identified.

### **Communities & Housing**

#### **Neighbourhood Regeneration**

36. The Neighbourhood Renewal Schemes budget is £703,000 including £353,000 from the previous year. Projected expenditure for the year is £500,000 for schemes including a new 3G sports pitch in Splott and at Llanrumney Hall, with the remainder slipping to the next financial year.
37. An initial budget allocation of £250,000 was requested and approved in 2021/22 towards District and Local Centres of which £235,000 was slipped into the current financial year. Expenditure of around £50,000 is projected for 2022/23 on design fees, with the remainder continuing to be carried forward into future years to develop comprehensive schemes. This is for a range of placemaking interventions to support priorities identified in South Riverside, Cowbridge Road East, Adamsdown/Roath and as part of City Centre Recovery Strategy. Bids for external Welsh Government grant funding as part of Transforming Towns and to the Social Prosperity Fund will be submitted, with match funding from a range of existing linked council budgets.
38. The need to complete legal procedures and consultation continues to result in delays in implementing alleygating projects, with approximately £50,000 of the total £198,000 budget due to be spent in year. The remainder will be available for schemes in 2023/24.
39. Several schemes continue to progress under the Welsh Government Targeted Regeneration Investment Programme (TRIP), paid for by a combination of external grant and Council match funding. Works on Tudor Street to improve the public realm environment and external improvements to commercial premises are due to be completed in September 2022 fully

utilising the Council's match funding element of £801,000 carried from 2021/22 and allocated transport funding for city centre enabling works.

40. Improvement works at St Mary Street, costing an estimated £93,000, are due to be completed this year and will be funded by contributions from the Civil Parking Enforcement reserve.
41. Expenditure on Rhiwbina Hub is due to complete in 2022/23, with expenditure this year forecast at £895,000. Alongside the existing budget allocation and use of displaced grant funding from 2021/22, further grant funding has been applied for and approved in principle to cover additional costs of the scheme and equipment.
42. The Council budget remaining to develop a Multi-Agency City Centre Youth Hub totals £2.036 million. Pending a review of alternative options and sites by Cabinet to deliver a viable project, only professional fees are likely to be incurred during 2022/23. Expenditure of £134,000 is assumed to take place in the year, with additional budget may need to be brought forward subject to progress.
43. A vacant site on Cowbridge Road West, enjoys a prominent road frontage and is considered an important gateway site into the city and two neighbouring wards. The Council aims to secure land to determine regeneration opportunities via a youth community-based facility. This is subject to a business case, working with external partners and a future business case to Cabinet.

### **Housing (General Fund)**

44. The Disabled Facilities Service budget for mandatory and discretionary grants to housing owner-occupiers as well as for administration costs for the grants is £5.270 million including slippage of £1.172 million. Expenditure for the year is projected to be £4.970 million with slippage of approximately £300,000. This is subject to service demand following emergence from the pandemic and also impacts arising from the price of equipment and materials.
45. As well as the above, an Enable Grant totalling £655,000 has been awarded by Welsh Government and will be fully utilised to deliver additional adaptations to help older, disabled and vulnerable people by, accelerating discharge from hospital to a safe and comfortable home, reducing delayed transfers of care and improving the individual's ability to maintain independence at home.
46. Subject to a business case, approval of partners and finding a suitable site, the Council approved a budget of £5 million on a self-financing basis, to develop an independent wellbeing hub. Expenditure of £3.500 million was initially assumed when setting the budget for the year, however at the end of 2021/22, a grant was received from Welsh Government of £1.101 million to support independent living solutions. This was used in that year and any displaced Council funding deemed available towards the Council's costs of

any approved wellbeing hub scheme. However, this is subject to finding a suitable site and confirmation of a business case so full slippage is currently projected into 2023/24.

47. Following initial design, ground condition and design works, the extent of any expansion to the Shirenewton Traveller site is to be reviewed. Further development works are to be undertaken during 2022/23, with risk of abortive costs, prior to any confirmation of costs and Welsh Government Grant approval towards costs of the project.
48. To facilitate comprehensive regeneration schemes, the estate environmental improvement allocation supports the costs of works to owner-occupier properties as part of the Public Housing programme. Schemes during the year include Belmont Walk and Anderson Place, with total expenditure of £183,000 currently anticipated and requiring £100,000 to be brought forward from the 2023/24 budget.
49. The Council is also working with Welsh Government to secure funding for a mixed tenure energy efficiency retrofit scheme to unimproved British Iron and Steel Federation (BISF) properties in Llandaff North and Rumney (up to 252 properties). This is proposed to be the subject of future Cabinet consideration, pending approval of a detailed business case and acceptable procurement of works.

### **Flying Start**

50. The budget for Flying Start Capital schemes for the year totals £1.137 million. This comprises of ongoing projects from previous years including £1.077 million in relation to allocations for furniture and ICT at five nursery sites across Cardiff, alongside an additional grant award of £60,000 for 2022/23, to fund ventilation upgrades, canopies, replacement boilers and refurbishment across 19 sites. Slippage of £500,000 from 2021/22 was in relation to Moorland Primary early years unit which will be utilised this year.

### **Childcare Capital Grant**

51. Expenditure of £204,000 relates to grants provided to nurseries as part of additional funding awarded by Welsh Government slipped from 2021/22.

### **Social Services**

#### **Adult Services**

52. There is a total programme budget of £36,000 due to slippage from 2021/22, all of which is due to be spent this year on professional fees for the design and development of a scheme for the Tremorfa Day Centre.



## Children's Services

53. The Young Persons Gateway Accommodation scheme aims to convert properties to include an office / sleep in accommodation on site, to provide supported accommodation for young people (16-24 years) to help them live independently whilst still providing intensive 24-hour support. A framework agreement is currently in progress with commencement of a new contract allowing the Council to source four additional 6-bed properties (24 units) due for September 2022. Expenditure of £100,000 is forecast for the year, with £148,000 slipped into next year to facilitate the sourcing of a further 18 units in 2023/24.
54. As part of the Right Home, Right Support Children Looked After Commissioning Strategy (2019-2022), £1.5 million was also made available in the programme over a two-year period to develop an emergency pop-up unit, assessment units, and additional residential places in the city. £500,000 was made available during this financial year to secure additional properties, but it is anticipated that this will need to be slipped again into 2023/24 as a result of receiving additional grant funding in 2021/22. Any expenditure on both the above schemes will be repaid on an invest to save basis.
55. In 2021/22, following numerous successful bids to the Intermediate Care Fund (ICF), £2.740 million of grant was allocated to the Council to support the development and acquisition of additional properties. Displaced Council funding is carried forward as slippage and now available to use for the following:
- Improvements to respite accommodation at Ty Storie for Children and Young People with Learning Disabilities and behaviour challenges. £200,000 expenditure is anticipated this year in developing the design, with slippage of £1.035 million.
  - Two new young person's assessment centres which will be high quality, fully accessible, fit for purpose and able to accommodate a wide range of programmes, activities, and resources specifically to meet a wide range of health and well-being needs of young people to enable independent living in the future.
  - Two residential properties linked to the new young person's assessment centres to facilitate service delivery specifically tailored to young people (10-17 years) and able to accommodate up to 3 young people each.
  - A ten-bedroom young person's safe accommodation supported living unit, with a specific focus on supporting existing placements and helping young people to progress to live independent lives in permanent accommodation.
56. For the latter two schemes, property searches are underway but due to the specialist nature of the property criteria, expenditure of £455,000 is currently projected, resulting in slippage into 2023/24 of £1.150 million.

57. The Council is working with Regional Partners and Welsh Government to develop new Capital Funding Arrangement in place of Integrated Care Funding. This is to support several outcomes including, increasing housing with care for older people and for children, development of integrated health and social care hubs and centres and other care needs to support service delivery closer to home. Further detail on any specific proposals impacting on Cardiff, would be considered following confirmation of the grant funding stream and process.

### **Planning, Transport & Environment**

58. The Directorate Programme for 2022/23 is £57.458 million with a variance of £9.234 million identified.

### **Energy Projects & Sustainability**

59. In May 2019, the Council entered into an agreement to obtain grant funding of £6.628 million for Phase one of the Cardiff Heat Network project from the Department of Business, Energy and Industrial Strategy (BEIS) and this was awarded in March 2021. A further £8.634 million interest free loan has also been agreed between the Council and Welsh Government and this will be passed on to Cardiff Heat Network (CHN) Limited, a special purpose vehicle created with the Council as sole shareholder. In 2022/23, CHN are due to draw down a total of £6.178 million on top of the £2.450 million drawn down in 2021/22. Subject to progress on site, budget may need to be brought forward from future years should the CHN need to draw down additional funds ahead of schedule.

60. A second phase of investment under the REFIT programme is now complete, with projected expenditure for the year covering final invoices and retentions. A total of £1.445 million has been invested over the course of the scheme, into energy conservation measures in the education estate including solar panels, sensors and lighting upgrades. Sites were selected following detailed assessment with the contractor including feedback from phase one and validation of the outcomes by SALIX. The investment will be paid back over an 8-year period from the savings generated from the measures.

61. The One Planet Cardiff Strategy is a strategic response to the climate emergency and includes a range of actions which together, form the basis of a delivery plan to achieve carbon neutrality across the city. As well as strategic projects mentioned above, the Council in 2021/22 allocated £3.9 million over 5 years towards capital investment and match funding for smaller schemes to support the strategy. The allocation for 2022/23 is £860,000 including slippage of £360,000. Projects approved include electric vehicle charging at Lamby Way, enhanced food composting facilities in schools, installation of sensors and equipment in schools and buildings including County Hall to support baselining for Carbon and a low carbon / recycled alternative for the A470 Carriageway resurfacing scheme. Slippage of £105,000 assumed at this stage.

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## Bereavement & Registration Services

62. The segregated capital asset renewal allocation for bereavement services totals £190,000 for 2022/23, including £95,000 of slippage from 2021/22. Full expenditure of this allocation is forecast, including on site infrastructure improvements, new vehicles and plant.

## Highway Maintenance

63. The approach to carriageway and footway maintenance adopts numerous repair and improvement treatments including localised patching, preventative and preservation treatments, resurfacing and reconstruction. In combination and when applied at the correct time they can minimise the whole life cost of maintenance whilst maximising the benefit of available budgets across the highway network. The budget available for treatments in 2022/23 including slippage is £6.017 million, with £1.7 million vired towards the cost of city centre highways resurfacing schemes linked to wider public realm projects.

64. Current projections suggest a requirement to bring forward budget in relation to highways and footpaths of £1.664 million from future years to address both an increase in costs and to support earlier intervention to avoid more expensive treatments. Any bringing forward of budgets will need to be managed within the overall five-year capital programme approved. Where there is a permanent change in the level of capital and revenue resources required to maintain condition, these will need to be set out in an updated Highways and Infrastructure Asset Management Plan.

65. Millennium Walkway and lighting refurbishment was completed in 2021/22. The bridges and Structures budget of £1.052 million including slippage will support culvert works at Llandennis Rd, Rhydlafer Farm, Bacton Court and The Crescent South. Expansion joints at Leckwith Woods Viaduct will be replaced along with ground anchors at the bottom of Rumney Hill. Slippage of this budget continues with £552,000 currently assumed into 2023/24, with options a longer-term plan of priorities to be updated as part of the 2023/24 budget.

66. The street lighting renewals budget is used for new and replacement columns, however in the short term, enhanced budget allocations have been made available to address electrical works on the Eastern Avenue. Implementation continues to be delayed with the design now complete allowing a procurement exercise to commence and be completed in the last quarter of the financial year. Slippage of £800,000 into 2022/23 is currently assumed, subject to the outcome of tenders.

67. Cabinet approved in May 2019, a £5.2 million invest to save business case for all remaining residential columns to be converted to LED. The project has been delayed due to internal capacity as well as restricted supply of lanterns resulting from shortages of semi-conductor components, however it is to be completed by March 2023, with the balance of £1.973 million to be fully spent.

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68. As part of a coastal risk management scheme to implement improvements from Rover Way to Lamby Way, Welsh Government grant is being utilised to develop the full business case, identify the preferred option, detailed design and cost estimates to construct coastal defence improvements. This will be the subject of a further Cabinet Report and procurement process to ensure works can start this financial year. This report will set out a clear understanding of scope, risks, mitigations, borrowing and Council match funding requirements to be in place. Subject to this, slippage of £4.196 million is assumed, with only a start on site by the end of the year.
69. A sum of £488,000 Council match funding including slippage has been allocated towards the implementation of flood prevention measures together with Welsh Government grant funding of £1.472 million approved to date in the year. This is for small scale and post storm schemes with only £41,000 match funding likely to be required this year.

### **Traffic & Transportation**

70. The asset renewal telematics budget of £801,000 including slippage is to be used for replacement of obsolete analogue CCTV cameras at various locations with High-Definition digital cameras and completing the replacement of the electronic signage/control system for the North Road tidal flow lane control system and Bute Tunnel entrance electronic signage.
71. The total budget for cycling development in 2022/23, including slippage from the prior year, is £2.741 million. Following a virement of £1 million towards the costs of the wider transport improvements and canal scheme at Eastside, Churchill Way, the balance of cycling budget will be used to match fund Welsh Government grant funded schemes for primary cycleways.
72. The Council Road Safety Schemes budget of £335,000 together with a sum of £511,000 Council match funding, will secure a range of grants where match funding is required towards schemes for Local Transport, Safe Routes in Communities and Road Safety as described below:
73. The Welsh Government revised allocation to Cardiff for the Local Transport Fund is £2.370 million. The fund supports development of integrated, effective, accessible, affordable, and sustainable transport systems. Schemes bid for and approved include £1.411 million towards improving sustainable transport and active travel measures in the City Centre, and £959,000 towards the A4119 strategic bus corridor scheme phase 2d.
74. The Welsh Government Road Safety Casualty Reduction grant approval is £89,000, which will support capital projects that reduce road casualties including traffic calming and pedestrian improvements on Thornhill Road.
75. The Welsh Government revised allocation to Cardiff for Safe Routes in Communities Grant of £1.369 million aims to improve accessibility and safety and encourage walking and cycling in communities. There is particular emphasis on improving routes to and from schools within the Canton and

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Trowbridge area. The allocation includes the School Streets scheme which is part of a wider programme working with schools to increase the use of active modes for school journeys, through targeted interventions and behaviour change support. School Streets have been introduced in Cardiff to improve safety for vulnerable users outside school gates, in response to safety concerns.

76. The Welsh Government allocation to Cardiff for Active Travel is £9.239 million. The purpose of the fund is to increase levels of active travel, improve health and well-being, improve air quality, reduce carbon emissions and connect communities. Funding will support Cardiff Cycle Superhighways Stage 1 (£6.345 million), Taff Trail upgrade at Hailey Park (£536,000), Active Travel to Schools (£679,000), Roath Park Cycleway (£198,000) and various improvements to the Integrated Cycle Network Plan (£1.481 million).
77. A new Welsh Government grant allocation of £286,000 has been awarded to continue the roll out of a 20mph default speed limit.
78. To comply with the requirement of the Environment Act 1995 – Air Quality Direction 2019, Welsh Government approved grant for a range of agreed measures. Grant will need to be claimed in accordance with terms and conditions, with planned expenditure during 2022/23 including completion of Wood Street and City Centre Eastside.
79. Following investment of over £9 million, works at Wood Street are planned to be completed in October, with works on adjoining routes of Great Western Lane continuing in parallel. City Centre Eastside includes phase one of the canal and permanent bus priority measures on Station Terrace and Churchill Way, a permanent cycleway and a revised car park routing system. Additional Cardiff Capital Region City Deal Metro Plus grant, of £1.098 million has been approved in the year, with virements from the cycling development and highway resurfacing budgets towards the respective elements of the scheme also costing c £9 million and with an expected completion in the summer of 2023.
80. To mitigate against the impact of the City Centre works in neighbouring areas, the Council has allocated a sum of £4 million, Including slippage the amount allocated in 2022/23 is £2.5 million. Expenditure planned in the year is £1 million primarily in relation to Tudor Street transport and green infrastructure improvement, with slippage of £1.5 million currently assumed towards projects which are subject to design and consultation processes including sites in Grangetown.
81. Following a virement of £300,000 towards the costs of the Eastside / Canal project at Churchill way, the Council Bus Corridor enhancements budget of £174,000 will be used for match funding towards Welsh Government Local Transport improvement scheme (A4119 Corridor Phase 2D).
82. Budget of £225,000 is carried forward from 2021/22 towards development of the transport interchange on the site of the former recycling site at Waungron Road, which is proposed to be delivered in parallel with a housing scheme.

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Design works in respect to a retaining wall will inform costs as part of a tender process to integrate the proposed transport hub with the residential development. Slippage of £200,000 is currently projected.

## **Resources**

83. The Directorate Programme for 2022/23 is £19.110 million with a variance of £9.252 million identified.

## **Technology**

84. The Modernising ICT budget aims to support digitisation of business processes. The budget for the year of £251,000 is to be spent on schemes including an upgrade of the Building Control IDOX software system and SAP Information Lifecycle Management including General Data Protection Requirements and archiving.

85. A total of £1.341 million is available for ICT Refresh schemes this year, including £541,000 of slippage from 2021/22. Full expenditure in year is projected, including on new equipment for the relocation of the Alarm Receiving Centre. This budget also covers a range of projects to support ICT resilience, capacity and capability including direct access and hardware replacement.

## **Central Transport Services**

86. The budget for the ongoing Vehicle Replacement scheme, to purchase new refuse collection vehicles, is £2.306 million this year, all of which is due to be spent. Further opportunities for grant funding will be considered during the year to support infrastructure and to increase the number of ultra-low emission vehicles.

## **Corporate**

87. In respect of the contingency budget of £200,000, given that it is early in the financial year, this is shown projected to be fully required, although as the year progresses, any under spend will be used to reduce the level of borrowing assumed in the Capital Programme.

88. The £500,000 Invest to Save budget for small schemes will be reviewed and adjusted in future monitoring reports if schemes are approved during the year.

89. As assumed when setting the 2022/23 budget, Cardiff Capital Region City Deal (CCRCD) is likely to make no drawdown request in year as part of the Council's agreed total £28.4 million Wider Investment Fund contribution to the region. The timing and value of any drawdown is subject to proposed

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projects being considered and approved by the CCRCD joint committee, but also the different funding streams available to CCRCD to manage expenditure obligations. Slippage of £6.792 million has been reprofiled into future years.

90. The Core Office Strategy has an overall allocation of £9.750 million included in the programme over a three-year period with £6.852 million of this currently included in 2022/23. This funding is to be used towards smarter working, digital infrastructure and building adaptations to allow consolidation into alternative council buildings. Drawdown of this allocation is subject to any expenditure being repaid on an invest to save basis. Expenditure for the year of £4 million is anticipated predominantly on the fit out of Oak House following its acquisition and the purchase of specialist equipment for the Alarm Receiving Centre (ARC). Following delays in finding a suitable contractor, works are now on site.
91. A contract for the acquisition of webcasting equipment and cabling at City Hall and County Hall was completed in May 2022, with expenditure of £160,000 forecast in 2022/23.
92. A total of £8 million is available to the Council to develop a grant scheme for bus operators to expand electric bus fleet use in the city. The detailed terms of the scheme are to be developed in 2022/23, however with lead in times for vehicles in the industry it is assumed any expenditure in year may relate to deposits only.

### Section 106 Schemes and Other Contributions

93. The table below shows the Section 106 and other contributions forecast to be spent at the time of setting the budget. This has been reviewed by Directorates and is reflected in the new projection at Month 4:

	Budget	Projection at Month 4	Variance
	£000	£000	£000
Parks & Green Spaces	1,423	1,750	327
Traffic & Transportation	1,202	484	(718)
Strategic Planning & Regulatory	681	607	(74)
Neighbourhood Regeneration	287	113	(174)
Economic Development	54	51	(3)
Education & Lifelong Learning	1,273	2,875	1,602
Public Housing (HRA)	189	2,400	2,211
<b>Total</b>	<b>5,109</b>	<b>8,280</b>	<b>3,171</b>

94. Some of the schemes included in the profile above are:

- Parks and Green Spaces – Schemes are proposed to be undertaken in a number of areas and include Adamsdown Open Space, Craiglee Drive and Blackweir woodland footpath improvements, Cogan Gardens, Tatham Road public open space, University Lawn - Cathays Park, and cycle improvements along the Roath Park Corridor. Capacity to deliver schemes continues to be reviewed.
- Traffic & Transportation – Public transport improvements, junction improvements, bus stops and bus borders; installation of CCTV and real time information, telematics and transportation schemes including the provision of bus routes in the city and strategic transport initiatives.
- Strategic Planning & Regulatory – Central Square Public Realm enhancement scheme.
- Neighborhood Regeneration – Improvement / Grants towards various Community facilities, subject to consultation.
- Economic Development – Support for small to medium enterprises in Llanishen.
- Education & Lifelong Learning – Contribution towards various school's projects where in accordance with the agreements.
- Public Housing – Development of new Council housing.

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**CORPORATE RISK MANAGEMENT - QUARTER FOUR 2021/22****FINANCE, MODERNISATION AND PERFORMANCE  
(COUNCILLOR WEAVER)****AGENDA ITEM: 8**

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**Reason for this Report**

1. To update Cabinet on the risk management position at quarter four 2021/22 and to highlight any changes from the quarter two 2021/22 report.

**Background**

2. Cabinet receives a risk management update on a biannual basis with the opportunity to make comments.
3. Each Directorate holds a Directorate Risk Register (DRR) and the Senior Management Team (SMT) collectively own a Corporate Risk Register (CRR). The CRR records the main risks to the delivery of corporate objectives and priorities, whilst the DRRs record the key risks to the delivery of Directorate functions and priorities.
4. A risk escalation process is in place, whereby each Director is required to take ownership of all residual (current) risks rated as 'red/amber' and above on their DRR and, at a minimum, to escalate all 'red' residual risks to SMT for collective ownership and review.
5. This reporting process allows SMT to determine if any changes are required to the CRR each quarter. The remaining escalated risks continue to be held on DRRs and are reviewed by SMT each quarter until it is agreed that mitigation is sufficient for risk ownership to transfer back to the Directorate.

**Issues**

6. Each Director has worked with their Risk Champion(s) to undertake their quarter four risk management review. The Risk Management Team has also provided advice and guidance on the measurement and reporting of risks. The quarter four risk assessments are presented on the Corporate Risk Register Summary Snapshot (Appendix A) and the Detailed Corporate Risk Register (Appendix B).

7. Governance & Audit Committee receives a risk management update each financial quarter with the opportunity to make comments. The last Governance & Audit Committee review was on the 19<sup>th</sup> of July 2022, at which time the risk management position at quarter four 2021/22 was presented.
8. From the feedback we received from members of the Governance & Audit Committee held on the 19<sup>th</sup> of July 2022, the quarter four 2021/22 update presented to Cabinet has been updated to reflect these comments. The Risk Management Team has engaged with Directorate Risk Champions to ensure all actions noted for each Corporate Risk to help achieve the Residual Risk Rating have either been completed or are in the process of being delivered. For each proposed action that has been provided to help Directorates meet their Target Risk, each action now has an estimated completion date, or if the action is ongoing, this has been highlighted.
9. The Risk Management Review process has two tiers (Directorate and Corporate) and the actions at each for quarter four are detailed as follows.

### **Directorate Risks**

10. At the quarter four position, 341 risks were reported from DRRs. All escalated risks and requests for de-escalation were discussed and approved in SMT on the 5<sup>th</sup> of July 2022.
11. It was agreed that twelve Directorate risks would be carried forward as SMT escalated risks at quarter four.

<b>Directorate</b>	<b>Directorate Risks</b>	<b>Risks at SMT Escalation Point</b>
Economic Development (inc Waste)	48	2
Education	27	0
Housing & Communities	58	2
Performance & Partnerships	16	1
Social Services	49	6 (1 Shared)
Planning, Transport & Environment	23	0
Resources	110	1
Governance & Legal Services	10	1 (shared)
<b>Total</b>	<b>341</b>	<b>12*</b>

\* Includes one shared

### **Corporate Risks**

12. SMT collectively reviewed the escalated directorate risks and corporate risk updates at the end of quarter four. Risks associated with COVID-19 and Brexit have been included in Directorate Risk Registers, and these

are to be reviewed and managed following the Council's risk management process.

13. The Increasing Demand (Children's Services) risk was escalated to SMT with a change in its residual risk from C1 to B1, in light of sustained high and increasing level of demand, complexity, and price.
14. The Budget Monitoring Risk and Financial Resilience Risk remain as previously reported although they will need close review going forward. Whilst it is the case that both the 2021/22 outturn and the Budget Settlement for 2022/23 were positive, the strong headwinds of economic uncertainty combined with geopolitical factors being experienced currently are forecast to impact significantly on budget deliverability this year. For example, price inflation pressures on utilities, fuel, materials, and food put significant pressure on the Council to deliver services within budgets set.
15. There is clearly a potential for the impact of ongoing financial challenges to adversely affect service delivery and heighten corporate risks. Therefore, there continues to be a need to ensure that future actions to address and manage all corporate risks are set out clearly in terms of impact and date of implementation. This will be essential to ensure that appropriate and proportionate action is being taken and is being planned to achieve effective control of all risks.

#### **Reason for Recommendation**

16. To enable the Cabinet to monitor risk management activity and consider the Risk Management Review – quarter four 2021/22.

#### **Legal Implications**

17. There are no direct legal implications arising from this report. However, one of the benefits of identifying risk is that mitigation measures may be taken, if appropriate, and consequently successful claims against the Council may be avoided altogether or reduced.

#### **Financial Implications**

18. The Corporate Risk register will be used to guide the Internal Audit Plan and the Council's resource planning processes and forms an important part of the governance arrangements for the Council. There will be financial implications associated with the issues outlined in paragraphs 13 and 14, as set out in further detail in Appendix A. These are also under review as part of the Council's established budget monitoring and budget setting processes.

#### **Property Implications**

19. There are no specific property implications in the Corporate Risk Management – quarter four report. County Estates continues to work closely with relevant service areas in monitoring property related risks through both Corporate and Directorate Risk Registers.

## **HR Implications**

20 There are no HR implications for this report.

## **RECOMMENDATION**

Cabinet is recommended to note the content of the Corporate Risk Register.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>CHRIS LEE</b> Corporate Director Resources
	22 September 2022

*The following appendices are attached:*

**Appendix A** - Corporate Risk Register Summary Snapshot – Q4 2021/22

**Appendix B** - Detailed Corporate Risk Register – Q4 2021/22

# Corporate Risk Register Summary Snapshot Quarter 4 2021/22

Appendix A

Number of Risks by Inherent Risk Rating

Likelihood	A	A1 10	A2 1	A3	A4
	B	B1 6	B2 4	B3	B4
	C	C1	C2	C3	C4
	D	D1	D2	D3	D4
	E	E1	E2	E3	E4
		1	2	3	4
		Impact			

Number of Risks by Residual Risk Rating

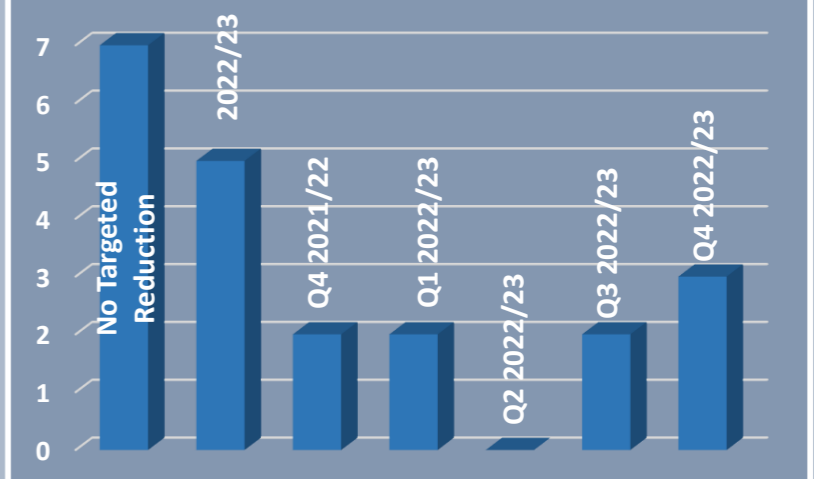
Likelihood	A	A1	A2	A3	A4
	B	B1 2	B2 5	B3 1	B4
	C	C1 1	C2 6	C3	C4
	D	D1 3	D2 3	D3	D4
	E	E1	E2	E3	E4
		1	2	3	4
		Impact			

Number of Risks by Target Risk Rating

Likelihood	A	A1	A2	A3	A4
	B	B1 1	B2 1	B3	B4
	C	C1	C2 5	C3 2	C4
	D	D1 4	D2 5	D3 2	D4
	E	E1	E2	E3 1	E4
		1	2	3	4
		Impact			

Inherent Risk Rating	Corporate Risk Title	Residual Risk		Target Risk			
		Rating	Movement from Q3	Rating	Movement from Q3		
A1	Climate Change	B2	↔	C2	↔		
	City Security	B1	↔	B1	↔		
	Air Quality & Clean Air Strategy	B2	↔	C3	↔		
	Cyber Security	C1	↔	D1	↔		
	Budget Monitoring (Control)	D2	↓	D2	↔		
	Financial Resilience	C2	↔	C2	↔		
	Schools Organisation Programme (Band B)		↔	E3	↔		
	Health and Safety		↔	D3	↔		
	Non-completion of Stat Building Eqpt Maintenance	D1	↔	D2	↔		
A2	Welfare Reform	B2	↔	B2	↔		
B1	Coastal Erosion	B2	↔	C2	↔		
	Waste Management		↔		↔		
	Increase in Demand (Children's Services)	B1	↑	D1	↔		
	Education – Schools Delegated Budgets	C2	↔	D2	↔		
	Business Continuity	D1	↔	D1	↔		
B2	Safeguarding	D2	↔	D2	↔		
	Education Consortium & Attainment		B3		↔	C3	↔
	Legal Compliance		C2		↔	C2	↔
	Performance Management		D2		↔	D2	↔
	Fraud, Bribery and Corruption	D2	↔	D2	↑		

Corporate Risks - Target Reduction Date



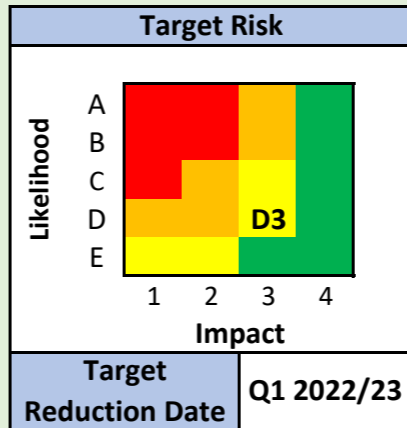
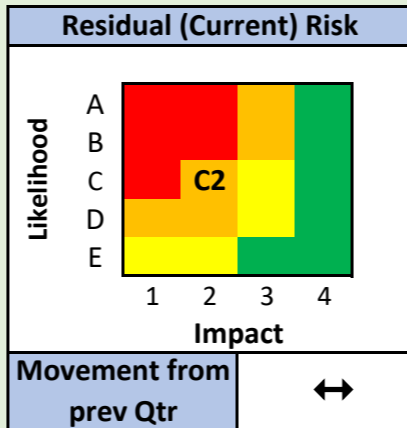
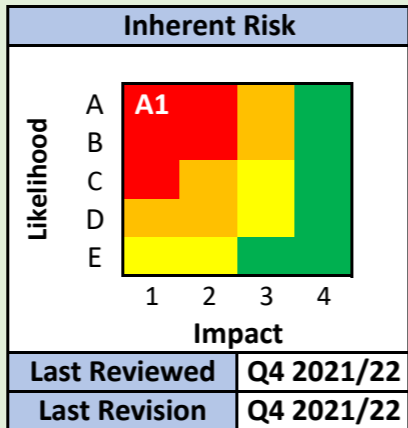
Key

High (Red)	Medium (Red-Amber)
Medium (Amber-Green)	Low (Green)
↓ Decrease from previous quarter	
↔ No change from previous quarter	
↑ Increase from previous quarter	

Mae'r dudalen hon yn wag yn fwiadol

# Non-completion of Statutory Building Equipment Maintenance

**Description**  
 Non completion of cyclical statutory inspections or the remedial works arising out of the inspections, required to maintain the premises and related installations in a safe and legally compliant condition.



**Risk Owner(s)**

Neil Hanratty (Donna Jones)      Councillor Russell Goodway Investment & Development

**What we've done/are currently doing to achieve the Residual Risk Rating**

**Contractor**

- Building Services have appointed a competent contractor to undertake Statutory Planned Preventative Maintenance (PPM) for which it is responsible. Consequential remedial work identified on test certificates.
- Improved statutory maintenance contracting arrangements in place from Q1 2019/20 inc. use of SFG 20 as specification for statutory obligations testing and new risk based specification for legionella management supported by RAMIS.
- FM competent person(s) review all test certificates, remedial work captured and communicated to client as necessary/applicable
- Statutory Obligations Team has been established within Building Services to improve monitoring and supervision of statutory obligations contractor. Contractors have been trained in the use of RAMIS in order for test certs to be uploaded directly to the system by contractors.

**RAMIS IT Software**

- RAMIS implemented across the Council with bi-monthly reporting on statistics to SMT;
- 500 Building Managers have received training in their responsibilities and use for the RAMIS system, including schools estates staff and Head teachers.
- Full time officer Administrating RAMIS, providing training and issuing reports from the system to all service areas to push compliance ratings up to a minimum of 80% set by SMT.
- Condition surveys have been completed which represents an extensive piece of work to improve our understanding and knowledge base of all the Council's land and property holdings.

**Corporate Landlord Programme**

- County Estates senior management structure established supporting - Strategic Asset Management, Capital Delivery and Property Services, to manage and deliver all the Council's non-domestic property functions within one portfolio. County Estates - Assistant Director appointed October 2020.
- The 'One Front Door' approach was rolled out across the corporate estate by end of Q4 19/20.

**Statutory Obligation Compliance**

- Continue to commission work to undertake required compliance testing (and works required) where Building Services has responsibility to do so, as defined on RAMIS.

**COVID-19**

- Following initial restrictions on the type of statutory compliance testing being done in Council buildings, full testing has resumed in Qtr 3 (save PAT testing in schools in the latter stages on Qtr3 as requested by H & S) although there have been issues in gaining access to some schools.
- As a direct result of the ongoing COVID variant issue, access into some buildings has been difficult/not possible meaning that some testing works are being delayed. A similar situation applies in respect of the undertaking of some remedial works arising from the testing that has been undertaken. Therefore, the risk reduction target date has changed to Q1, 22/23.

**What we plan to do to meet target**

**Statutory Obligation Compliance**

- Continue to commission investigations / work to complete required compliance testing (and works required) in respect of 'gaps' in compliance identified by reports from RAMIS. **ONGOING**
- Complete a review of arrangements in place to contract statutory inspections/maintenance for non-domestic Council premises, which are currently not being commissioned through Building Services. **Q3 2022/23**

**Landlord / Occupancy Agreement**

- Landlord occupancy principles established and reviewed for inclusion in non-schools Buildings Handbook which has been circulated to relevant OM's for comment and is now available for reference through the One Front Door portal. This document will be subject to a further review following Cabinets consideration of the Property Strategy in Q3, 21/22. (timeline for the review **Q2 2022/23**)

**Potential Impact(s)**

Potential consequences of non-compliance with statutory maintenance:

- Fatalities or serious injuries
- Closure of part or whole of facilities with major disruption to service delivery
- HSE interventions and consequential actions including fines and prosecution;
- Significant additional expenditure requiring realignment of Corporate budgets;
- Temporary relocation of staff
- Temporary loss of operational service
- Invalidation of insurance policy
- Serious adverse impact on reputation
- Damage to fabric of building or other equipment

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	<ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Partnership</li> <li>Community &amp; Environment</li> <li>Stakeholder</li> </ul>
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**Linked Risks**

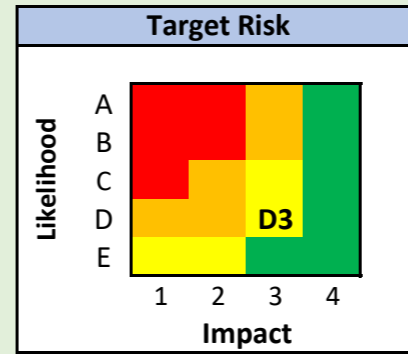
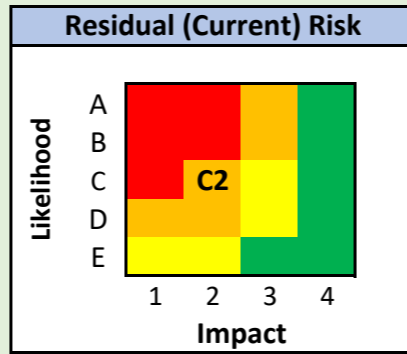
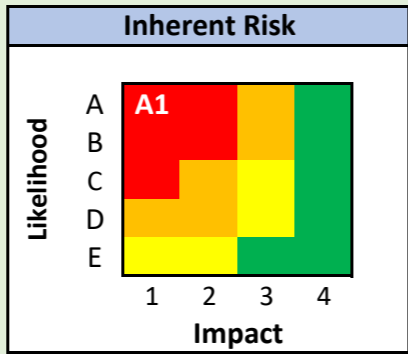
Health & Safety

**Key Indicators / Measures used to monitor the risk**

Compliance stats from the Corporate Health & Safety Team.

# Health & Safety

**Description**  
 Non Compliance with corporate Health and Safety arrangements to control key risks across the Council in line with statutory requirements.



Last Reviewed	Q4 2021/22
Last Revision	Q4 2021/22

Movement from prev Qtr	↔
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Target Reduction Date	2022/23
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**Risk Owner(s)**

Neil Hanratty (Donna Jones)	Councillor Chris Weaver Finance, Modernisation and Performance
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**What we've done/are currently doing to achieve the Residual Risk Rating**

- RAMIS - reporting recommenced using the new platform, reports submitted to Corporate Health & Safety Forum and Senior Management Team.
- Condition Surveys School Buildings - Complete Dissemination of Condition Survey information to schools as and when COVID-19 restrictions permit.
- Due to the continued pandemic H&S and OH resources will continue to be repurposed to support the workforce and limit the transmission of the virus in Council workplaces, as well as setting policy and guidance in relation to infection control and mental health and wellbeing support. From September 2021 the H&S Team resumed normal operations in addition to supporting issues related to COVID-19. In Q4, 2021/22 OH resumed face to face appointments and health surveillance.
- HSE visited 10 Cardiff Schools to review COVID-19 arrangements went well with positive feedback provided and no corrective actions required.
- Procedures to support the safe operation of the fire suppression system in Lamby Way MRF completed and Fire Risk Assessment updated, closing out insurance fire safety improvements.
- Training webinars for building management for community organisations operating Council premises to roll out when COVID-19 restrictions permit.
- Continue Asbestos Training - Online and face to face in line with COVID-19 Safety measures is currently taking place, the Asbestos Team recently gained approval from UKATA to deliver Non-Licensable Asbestos training. Commenced briefing sessions for technical departments and Building Managers to ensure they understand their responsibilities under the Corporate Asbestos Management (CAM) Plan.

**What we plan to do to meet target**

- No additional action identified to mitigate. Continue to monitor embedding of current controls to reduce the overall risk **ONGOING**

**Potential Impact(s)**

- Fatalities
- Serious injuries
- Prosecution – fines for corporate body and/or fines/imprisonment for individual
- Civil Claims
- Negative Publicity

**Type(s) of Impact**

- Service Delivery
- Reputational
- Legal
- Financial

**Linked Risks**

Non-completion of Statutory Building Equipment Maintenance

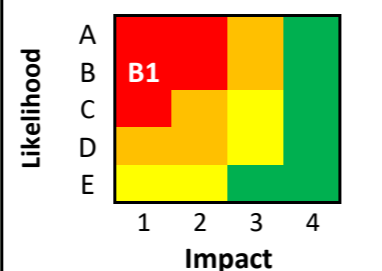
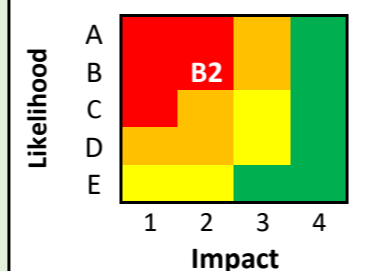
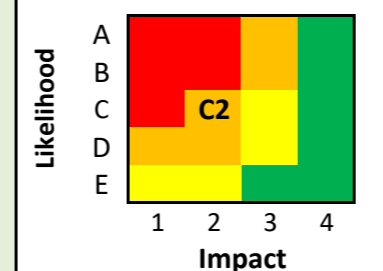
**Key Indicators / Measures used to monitor the risk**

RAMIS is used to monitor statutory risk in relation to premises safety, bi-monthly reporting to SMT, quarterly reporting to Health and Safety Forum.  
 Compliance against annual Corporate H&S Objectives, used to monitor improvement secured in Service Areas, reported to Health and Safety Forum.

Judalen 794



# Waste Management

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)
<p>Failure to deliver recycling performance to meet statutory recycling performance targets within waste directive</p> <p>On 26 November, the final validated 2019-20 Local Authority Recovery Target (LART) showed Cardiff achieved a recycling performance of 58.14% compared to the target of 64%</p>	 <p style="text-align: center;">Likelihood</p> <p style="text-align: center;">Impact</p> <p style="text-align: center;">Last Reviewed Q4 2021/22 Last Revision Q4 2021/22</p>	 <p style="text-align: center;">Likelihood</p> <p style="text-align: center;">Impact</p> <p style="text-align: center;">Movement from prev Qtr ↔</p>	 <p style="text-align: center;">Likelihood</p> <p style="text-align: center;">Impact</p> <p style="text-align: center;">Target Reduction Date 2022/23</p>	<p style="text-align: center;"><b>Neil Hanratty</b> (Matt Wakelam)</p> <p style="text-align: center;"><b>Councillor Michael Michael</b> Clean Streets, Recycling and Environment</p>

Potential Impact(s)
<p><b>Financial</b></p> <ul style="list-style-type: none"> <li>Penalties and loss of grant support</li> <li>Continuing financial costs to service</li> </ul> <p><b>Legal &amp; Regulatory</b></p> <ul style="list-style-type: none"> <li>Failure to comply with waste directive, leading to sanctions, penalties or interventions</li> </ul> <p><b>Strategic/ Reputational</b></p> <ul style="list-style-type: none"> <li>Reputational consequence with citizens and key stakeholders</li> </ul>

What we've done/are currently doing to achieve the Residual Risk Rating
<p><b>Developing Cardiff's Recycling Strategy, demonstrating how Cardiff aims to improve recycling performance and meet statutory targets - to be published for consultation following Cabinet Meeting on 16 December 2021, which resolved that;</b></p> <ol style="list-style-type: none"> <li>Approval be given to the consultation on the draft recycling strategy 2021-25 – 'Make a change to save our planet – Reduce, Re-use, Recycle' and associated resident survey on improving recycling performance.</li> <li>Agreement be given to:             <ol style="list-style-type: none"> <li>support a pilot of 3 stream segregated collections for glass, mixed containers (plastic and metal) and paper / cardboard; alongside the use of reusable bags.</li> <li>retain the Recycling Centre booking system and 'no black bag' policy.</li> <li>cease the provision of red and white striped bags for residents living in properties unable to store 140litre residual bins, instead allowing residents to present three refuse bags per fortnight from 2022</li> </ol> </li> </ol> <p><b>Wider Governance &amp; Compliance</b></p> <ul style="list-style-type: none"> <li>Working in partnership with WG, WRAP &amp; WLGA to deliver new Recycling Strategy, Implementation Plan &amp; individual business cases.</li> <li>Programme Board developed to review individual business cases prior to decision making process - Officer/ Cabinet/ Council decisions.</li> <li>Modelling of 3-stream recycling collections taking place, working alongside WRAP; includes bottle and glass collections in a single pass with containers (cans and plastics) and paper/card.</li> <li>Trade Waste and recycling performance review to improve performance in lieu of income (ongoing)</li> <li>A review of Recycling Centres has been undertaken, working with Local Partnerships and Welsh Government to ascertain how best to proceed for Cardiff to meet the 70% recycling target in 2024/25. This work has developed a road-map to improve Cardiff's recycling performance, supported by WG</li> <li>A review of the performance of the Recycling Centres has been undertaken as part of Recycling Strategy, reviewing the controls at the recycling centres</li> <li>On 18 November 2021, the final validated 2020-21 Local Authority Recovery Target (LART) showed Cardiff achieved a recycling performance of 55.79% compared to the target of 64%, with a resultant potential penalty as notified by WG on 18 January 2022 - impacted by Covid-19</li> </ul> <p><b>Supply Chain Issues</b></p> <p>This situation is also now being exacerbated by a national shortage of drivers - a number of suppliers on the frameworks used for supply of bins, caddies, bags etc have declared a state of emergency in the UK due to the shortage of drivers, with resultant failed or none delivery being classed under 'Force Majeure' to absolve any liability - Directorate will work with Commissioning &amp; Procurement and Legal to ascertain the validity of this stance, however further cost increase and delays are anticipated.</p> <p><b>Workforce Issues:</b></p> <p>Shortage of HGV drivers to support delivery of recycling and waste collection services due to Brexit. Internal development of officers to obtain HGV qualification - takes 6 months to develop an officer utilising internal training. Training programme commenced beginning of Q3 - ongoing rolling programme</p> <p><b>Development of Recycling Plan for optimising resources including considerations of statutory fines</b></p> <ul style="list-style-type: none"> <li>Review/ benchmarking completed on tonnages/ recycling levels/ costs of disposal compared to other Welsh Authorities and UK</li> <li>Media &amp; communications across Cardiff with focus on key areas for recycling improvement (ongoing)</li> <li>New education &amp; enforcement programme to reduce contamination in recycling and garden waste (ongoing)</li> <li>Targeted &amp; tailored intervention to deal with contamination in hot spot areas across the City (ongoing)</li> <li>Activities supporting optimising resources through successful WG Circular Economy Fund (CEF) grant bids:             <ul style="list-style-type: none"> <li>Wastesavers re-use centre in Lamby Way (Opened Sept 2021)</li> <li>Trials in flats (co-mingled, re-useable sacks, aperture bins)</li> <li>Segregation of litter from community litter picks (split caged transits, dual hoop litter picking equipment)</li> <li>Support for re-use &amp; repair community projects (Benthyg, and Llanrumney Hall)</li> <li>Community fridge (reduction of waste to Energy from Waste - but not claimable tonnage)</li> <li>Tetra Pak recycling (reduction of contamination in co-mingled recycling /reduced material to Energy from Waste)</li> </ul> </li> <li>Recycling Centres now managed via booking system - the replacement of residual waste &amp; recycling waste skips with a non-recycling skip, supported by new procedures, has meant recycling performance at centres has increased from 70% to 90%.</li> <li>Hygiene - Absorbent Hygiene Products (AHP) from Municipal Solid Waste to Recycling as of May 2021</li> </ul>

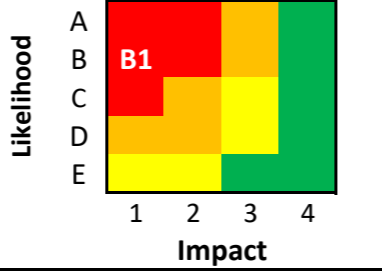
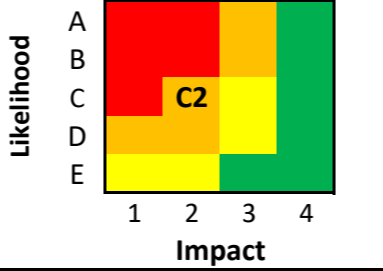
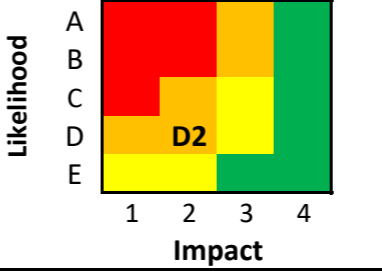
What we plan to do to meet target
<p><b>Cardiff's Recycling Strategy</b></p> <ul style="list-style-type: none"> <li>Recycling Strategy for Cardiff - this will set out the Council's long-term objectives over the next 5 years and consider economic, social and environmental aspirations, to ensure Cardiff is one of the leading cities in the world for recycling - planned to go to July 22 Cabinet meeting for final approval following consultation - <b>Q2 2022/23</b></li> <li>Pilot for reusable sacks and segregated recycling commenced 24th Jan 2022 - participation 4000 properties. Pilot will inform business case for phased citywide roll out, commencing in <b>Q1 2022/23</b></li> </ul> <p>• Recycling Performance Targets set within the Strategy are:                  2021/22 = 64% - current performance for year is 59.59% (unvalidated)                  2022/23 = 64%                  2023/24 = 66%                  2024/25 = 70%</p> <p><b>Wider Governance &amp; Compliance</b></p> <ul style="list-style-type: none"> <li>Senior Management to have ongoing regular engagement and discussions with WG, WRAP and WLGA on Cardiff's Recycling Strategy and collaborative working model - fortnightly meetings <b>ONGOING</b></li> <li>Quarterly meetings with Julie James MS, Minister for Climate Change, and WG to monitor actions to improve recycling performance <b>ONGOING</b></li> </ul> <p><b>Workforce Issues:</b></p> <ul style="list-style-type: none"> <li>Continuation of internal training of Officers wanting to become HGV drivers – rolling programme ongoing - <b>Q4 2022/23</b></li> </ul>

Type(s) of Impact
<ul style="list-style-type: none"> <li>Reputational</li> <li>Legal &amp; Regulatory</li> <li>Financial</li> </ul>

Linked Risks

Key Indicators / Measures used to monitor the risk
<ul style="list-style-type: none"> <li>Quarterly monitoring recycling % from waste data flow - 20/21 impacted by Covid-19:                      Q1= 43.67% Q2= 59.83% Q3= 58.36% Q4= 60.55                      Total final validated 20/21= 55.79%</li> <li>Monthly tonnage monitoring</li> <li>Monthly financial monitoring in each area of waste</li> </ul>

## Education - Schools' Delegated Budgets

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)									
<p>The number of schools with deficit budgets and/or the overall value of deficit budgets increases, or that those schools (particularly in the Secondary sector) with existing deficit budgets do not deliver agreed deficit recovery plans.</p>				<p><b>Mel Godfrey</b> (Neil Hardee)</p>	<p><b>Councillor Sarah Merry</b> Deputy Leader &amp; Education, Employment &amp; Skills</p>								
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="background-color: #d9e1f2;">Last Reviewed</td><td>Q4 2021/22</td></tr> <tr><td style="background-color: #d9e1f2;">Last Revision</td><td>Q4 2021/22</td></tr> </table>	Last Reviewed	Q4 2021/22	Last Revision	Q4 2021/22	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="background-color: #d9e1f2;">Movement from prev Qtr</td><td style="text-align: center;">↔</td></tr> </table>	Movement from prev Qtr	↔	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="background-color: #d9e1f2;">Target Reduction Date</td><td>Q3 2022/23</td></tr> </table>	Target Reduction Date	Q3 2022/23		
Last Reviewed	Q4 2021/22												
Last Revision	Q4 2021/22												
Movement from prev Qtr	↔												
Target Reduction Date	Q3 2022/23												
	<b>What we've done/are currently doing to achieve the Residual Risk Rating</b>			<b>What we plan to do to meet target</b>									
	<ul style="list-style-type: none"> <li>As at 31st March 2022, two schools have a deficit balance. Both schools have long term plans to emerge from deficit. For the 2022/23 financial year, four schools applied to set deficit budgets.</li> <li>The Education Directorate receives regular detailed budget monitoring reports from the LA Financial Services team and manages its budgets within the parameters set by the LA.</li> <li>There is good engagement with schools on financial issues through the well established School Budget Forum arrangements with all papers and meeting agenda and minutes made available on the Council's website.</li> <li>There is an agreed protocol for dealing with schools in deficit and the LA has agreed local parameters for managing schools surplus balances. These were temporarily amended at the end of the 2020/21 financial year to take account of the increased level of balances following the distribution of grants from Welsh Government in March 2021.</li> <li>Officers from Education and Financial Services work with individual schools through Headteachers and Governing Bodies to formulate Medium Term Financial Plans (MTFP) to seek to either balance individual school deficits within four financial years or to ensure that the accumulated deficits were frozen or slowed as much as possible.</li> <li>Officers continue to monitor and challenge those schools in deficit before allowing any additional financial commitments, both staffing and other expenditure.</li> <li>For each school in deficit, the Council has identified a monitoring officer to provide an independent challenge to the school. This is in addition to the LFM Officer currently supporting that school.</li> <li>A working group has been established to examine the impact of the 2021/22 budget settlement for schools, with the aim of reviewing the formula used to distribute school funding and the assumptions underpinning the medium term financial planning process. A report on the conclusions and recommendations for the task groups has been presented to the School Budget Forum.</li> <li>The Financial position of schools as at Q4 has improved; there has been an increase in the level of surplus balances in schools.</li> </ul>			<ul style="list-style-type: none"> <li>Officers exercise the statutory powers of intervention on a school or schools in deficit who are unable to provide a medium term financial plan. This may involve removing delegation from a Governing Body. <b>ONGOING</b></li> <li>Officers explore through the School Organisation Planning process how different organisational arrangements for schools would affect the supply of pupils to schools thus affecting their delegated budgets. This will include an understanding of the long term impact of any unused school supply places on the funding formula. <b>ONGOING</b></li> <li>Working with CSC to ensure that maximising value from constituent parts of Education Improvement Grant is secured and that there is clarity of allocation mechanism. <b>ONGOING</b></li> <li>Improve individual school risk assessment processes in order to provide an early indication of those schools who may be at risk of entering a deficit position. <b>Q4 2022/23</b></li> </ul>									
	<b>Potential Impact(s)</b>	<b>Linked Risks</b>		<b>Key Indicators / Measures used to monitor the risk</b>									
	<ul style="list-style-type: none"> <li>An overall deficit arising from schools budgets would count against the funding available for the Council</li> <li>Schools with deficit budgets may struggle to adequately fund the resources required to achieve the desired levels of educational attainment</li> <li>Schools with deficit budgets may struggle to adequately fund maintenance of school buildings creating an issue for other budgets, eg Capital/SOP Band B</li> <li>Schools that continually fail to address deficit budgets may ultimately require LA intervention, with a corresponding increase required in centralised resources</li> </ul>	<p>Linked risk to Covid 19 issues particularly with regard to decrease in income, impact on grants and inability to manage staffing changes.</p>		<ul style="list-style-type: none"> <li>School budget monitoring position</li> <li>Number of schools setting deficit budgets</li> <li>Final budget balances</li> </ul>									
	<b>Type(s) of Impact</b>												
	<ul style="list-style-type: none"> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>												

## Schools Organisation Programme (Band B)

Description		Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)									
<p>Failure to deliver on aspects of the School Organisation Programme, which is significant in value and complex. The programme consists of Band B (£284m) 21st Century Schools, asset management improvement work, ICT and sufficiency projects. The programme of work spans across a number of directorates, requires significant capacity and has significant capital spend.</p>					<p><b>Mel Godfrey</b> (Richard Portas)</p>	<p><b>Councillor Sarah Merry</b> Deputy Leader &amp; Education, Employment &amp; Skills</p>								
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Target Reduction Date	Q3 2022/23													
Potential Impact(s)		What we've done/are currently doing to achieve the Residual Risk Rating			What we plan to do to meet target									
<ul style="list-style-type: none"> <li>Opportunities to enhance the school estate, and transform education will be missed</li> <li>Insufficient secondary places in some central and north east areas of the city</li> <li>Insufficient places in ALN settings across the city, leading to costly placement in out of county &amp; private settings</li> <li>School buildings that are not suitable for teaching and learning</li> <li>Further degeneration of school buildings &amp; rise in asset management backlog</li> <li>Project cost and time overruns</li> <li>Risk that school ICT infrastructure fails in the short to medium term and does not support the new curriculum</li> <li>Risk that in the current situation, learners do not have access to ICT equipment to support distance learning</li> </ul>		<ul style="list-style-type: none"> <li>21st Century Schools Band B funding bid was submitted to Welsh Government in July 2017 and the Strategic Outline Case for £284m was approved in November 2017. Two Cabinet Reports in October and December 2018 outlined the priorities for this second phase of funding. SOP reports for Fitzalan, Doyle Avenue, Cathays and St Mary the Virgin have been considered by Cabinet under Band B. Progression of these schemes was delayed as a result of COVID-19 but are now under way. A review of Band B has been completed and identified the priority projects to progress. Further work is required to establish Band C priorities.</li> <li>A draft strategic plan for ALN provision has been submitted to Cabinet in October 2021.</li> <li>Successfully negotiated COVID-19 clauses with contractors for ongoing projects such as Fitzalan.</li> <li>Work is ongoing to make sure that all learners have access to digital devices, network and infrastructure to support mobile and distance learning.</li> <li>Robust governance model, in line with Corporate Landlord approach is in place and is supporting consistent decision making.</li> <li>Finance have re-profiled the capital and revenue budgets to assess the required budgets for each scheme. There are ongoing discussions with Welsh Government to assess the affordability of the programme in light of the current programme. The Council is considering additional asset funding in light of the pressing needs.</li> <li>Implementing more robust management and monitoring processes for the asset improvement programme, including the three "D" category High Schools, Fitzalan, Cantonian and Willows.</li> <li>The WESP has been submitted to cabinet as well as Welsh Government with feedback advising on minor changes to made.</li> </ul>			<ul style="list-style-type: none"> <li>Develop a high level SOP Strategy that outlines the short/ medium and long term aims of the whole programme. The SOP Strategy will be underpinned by the ongoing Band B review. <b>Q4 2022/23</b></li> <li>Strengthening of the capacity of the SOP team critical to ensuring effective delivery of the different elements of the programme. Developing capacity includes ensuring that corporate colleagues in departments including legal, strategic estates, capital projects, ICT, planning and highways and transportation are available. <b>Q4 2022/23</b></li> <li>Ensure that SOP reports are progressed as planned so that consultation and engagement can progress ahead of the pre-election period. <b>ONGOING</b></li> <li>Continue to hold active dialogue with Welsh Government and other professional parties to support progress and development. <b>ONGOING</b></li> <li>Prioritise population data development to underpin accurate projections and forecasts for existing resident populations and to support effective s106 negotiations going forward. <b>ONGOING</b></li> <li>Ensure consistent monitoring and reporting of all risks to Schools Programme Board. <b>ONGOING</b></li> <li>Continue to move forward with digital projects to support distance and mobile learning and embed into a long term and sustainable model. <b>ONGOING</b></li> <li>Complete a finalised WESP. <b>Q3 2022/23</b></li> </ul>									
Type(s) of Impact		Linked Risks			Key Indicators / Measures used to monitor the risk									
<ul style="list-style-type: none"> <li>Reputational</li> <li>Legal</li> <li>Financial</li> <li>Social</li> </ul>		<ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Stakeholder</li> <li>Health and Wellbeing</li> <li>Sustainability</li> </ul>			<ul style="list-style-type: none"> <li>Spend against the asset programme in financial year, in accordance with the responsibilities of schools and corporate landlord (Corporate Plan).</li> <li>Timelines to deliver projects within the SOP programme.</li> <li>New key performance measures which are being developed as part of the overarching SOP Strategy.</li> </ul>									

# Education - School Improvement & Attainment

Juddalen 798

**Description**

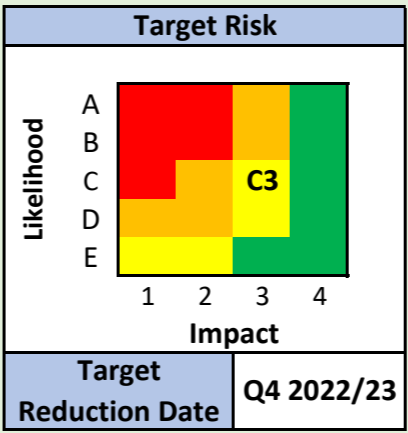
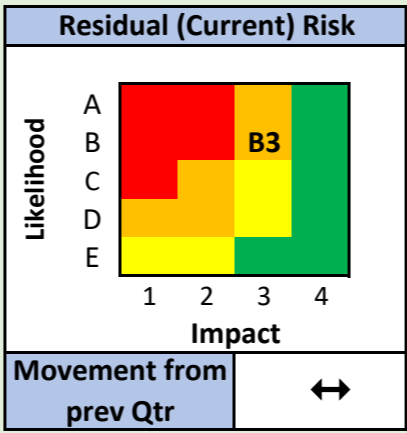
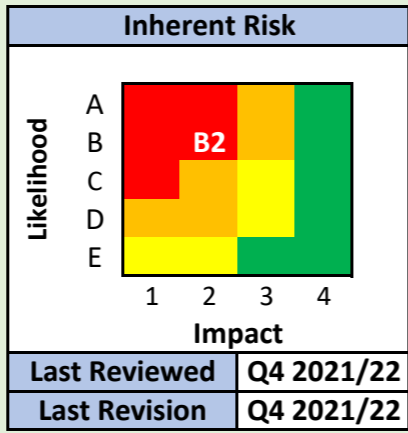
The risk that school improvement is not delivered as planned, in light of changing accountability and assessment arrangements and National Reforms (Curriculum and Additional Learning Needs).

**Potential Impact(s)**

- Learners do not reach their full potential
- Schools are not supported to improve
- Schools are not able to deliver the new curriculum
- Impact on Estyn judgements
- Value for money - CSC

**Type(s) of Impact**

- Reputational
- Legal
- Financial



**Risk Owner(s)**

**Mel Godfrey**  
(Mike Tate)

**Councillor Sarah Merry**  
Deputy Leader &  
Education, Employment & Skills

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Education and Lifelong Learning is supporting schools across the city in returning 'back to normal' operations where possible, moving forward with the new processes that have been embedded over the past two years. The LA is providing continued support to schools to ensure that pupils sitting summer exams have the best possible environment to achieve their best.
- The LA and CSC are supporting schools to prepare to introduce Curriculum for Wales 2022. There is flexibility in implementing the curriculum considering challenges faced as we continue to manage the pandemic and with ongoing operational issues faced by schools.
- Estyn concluded in their full inspection of Cardiff Education Services in February 2022 that there has been a sustained and incremental improvement in Cardiff Education in recent years. Inspection outcomes are strong, especially in the primary sector. Outcomes for outcomes for pupils across key stage 4 have been above or well above expectations in the majority of schools in the three years up to the pandemic. Outcomes for pupils that are eligible for free-school meals (efsm) has generally been above that of the same group nationally.
- Estyn noted that the LA has established strong working relationships with the regional consortium and there are robust processes for the support and challenge to schools causing concern.
- School inspections have resumed in Q4, with a number already under way, these include school inspections that were delayed as a result of COVID-19, with additional schools scheduled for May, June and July of this year.

**What we plan to do to meet target**

- Following the November '21 Inspection, Estyn recommended that the LA ensures that the work of the regional consortium (CSC) is focused appropriately on Cardiff's strategic priorities. Actions to align the work of the LA and CSC more closely will be carried forward into the new Directorate Delivery Plan. **Q4 2022/23**
- Closely monitor school exclusions and school attendance, paying particular attention to investigating alternatives to exclusions on a case-by-case basis; also by providing further support to families as well as making sure they are more involved in the process. **Q4 2022/23**
- Work with CSC to provide support to schools to develop teaching and learning approaches in line with Curriculum for Wales 2022 and prepare for new assessment arrangements. **ONGOING**
- Continue to support schools to prepare for ALN Reform. **Q4 2022/23**
- Enhance processes for All Schools Risk monitoring and Schools Causing Concern. **Q3 2022/23**
- Develop the Team Around the School approach, which is currently being piloted in the East and West of the city, to ensure that integrated support is offered to schools where there are specific concerns. **Q4 2022/23**

**Linked Risks**

**Key Indicators / Measures used to monitor the risk**

KS4 2018/19 School Performance, Outcomes from Estyn Inspections up to 2020.

# Air Quality & Clean Air Strategy

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)									
<p>Air quality in Cardiff does not meet statutory requirements set by legislation and continues to have a detrimental impact on health for residents and visitors to Cardiff.</p>				<b>Andrew Gregory</b> (Jason Bale)	<b>Councillor Caro Wild</b> Strategic Planning & Transport								
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Last Reviewed</td> <td>Q4 2021/22</td> </tr> <tr> <td>Last Revision</td> <td>Q4 2021/22</td> </tr> </table>	Last Reviewed	Q4 2021/22	Last Revision	Q4 2021/22	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Movement from prev Qtr</td> <td style="text-align: center;">↔</td> </tr> </table>	Movement from prev Qtr	↔	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Target Reduction Date</td> <td>2022/23</td> </tr> </table>	Target Reduction Date	2022/23		
Last Reviewed	Q4 2021/22												
Last Revision	Q4 2021/22												
Movement from prev Qtr	↔												
Target Reduction Date	2022/23												
	<b>What we've done/are currently doing to achieve the Residual Risk Rating</b>			<b>What we plan to do to meet target</b>									
	<p><b>RESIDUAL RISK RATING AFTER CURRENT CONTROLS BELOW - B2 = LIKELY/ SIGNIFICANT</b></p> <p><b>Monitoring</b></p> <ul style="list-style-type: none"> <li>• Non-automatic nitrogen dioxide (NO<sub>2</sub>) monitoring sites at 136 locations.</li> <li>• Data includes monitoring at schools as part of the TRO pilot projects at schools</li> <li>• There are three live 24/7 monitoring stations:               <ul style="list-style-type: none"> <li>- Cardiff Frederick Street: measuring levels of NO<sub>2</sub>, PM<sub>10</sub> &amp; PM<sub>2.5</sub>, SO<sub>2</sub>, CO and O<sub>3</sub></li> <li>- Richard's Terrace, Newport Road: measuring levels of NO<sub>2</sub> &amp; PM<sub>10</sub></li> <li>- Castle Street measuring levels of NO<sub>2</sub> PM<sub>10</sub> and PM<sub>2.5</sub></li> </ul> </li> <li>• 7 near real time indicative automatic analysers located predominantly in Cardiff's City Centre (5), one in Llandaff within the established AQMA and one in Canton on Landowne Road. These sites measure on a 24/7 basis, continuously monitoring for Nitric Oxide, Nitrogen Dioxide, Ozone, PM<sub>10</sub> &amp; PM<sub>2.5</sub>, and does so every 15 minutes</li> <li>• Order raised with Vortex to install up to 46 indicative low cost sensors – this has been funded through One Planet Cardiff.</li> </ul> <p><b>Air Quality Management Areas (AQMA's)</b></p> <ul style="list-style-type: none"> <li>• Cardiff has 4 existing declared Air Quality Management Areas (AQMA's) all as a result of elevated NO<sub>2</sub> concentrations from road traffic emissions.</li> </ul> <p><b>Clean Air Plan</b></p> <ul style="list-style-type: none"> <li>• Provisional monitoring results for Castle Street showed annual average for Castle Street was 26 µg/m<sup>3</sup> for NO<sub>2</sub> for 2021. However this includes closure period between Jan-October.</li> <li>• Interim Castle Street Option now implemented and general traffic returned from Nov. Ongoing assessment of results from Nov and Dec.</li> <li>• Results from January -March indicate 3 month average of 36 µg/m<sup>3</sup> for NO<sub>2</sub>. when annualised in comparison to 2018/2019 results, this reduces to 35µg/m<sup>3</sup>.</li> <li>• Ongoing monitoring of results will continue with potential more detailed assessment undertaken to provide more robust annualisation of results, as agreed with WG.</li> <li>• Mitigation measures to be detailed to WG if annualised results exceed agreed two threshold values of 35 µg/m<sup>3</sup> and 38 µg/m<sup>3</sup>.</li> <li>• Construction of Ph1 City Centre West scheme (Wood St &amp; Central Square) – ongoing</li> <li>• Completion of Bus Retrofitting Programme of 49 buses – buses have been fitted with exhaust technology which reduces NO<sub>x</sub> emissions from the buses by 90%</li> <li>• All 36 EV buses launched early January</li> <li>• Ongoing discussions with WG on Castle Street Options in terms of agreement for permanent option and timescales/ funding to do so.</li> </ul> <p><b>Taxi Scheme</b></p> <ul style="list-style-type: none"> <li>• T&amp;Cs for Grant Scheme signed off and submitted for political approval for launch in addition to these a further Euro 6 scheme funded directly by Cardiff Council.</li> <li>• 5 WAV EV taxis - Concession agreement contract with Days Hire Limited to facilitate leasing of vehicles. Welsh Gov has agreed to establish a T&amp;F group to assess how better the taxi lease scheme can be taken up due to failure of uptake.</li> </ul> <p><b>Clean Air Strategy and Action Plan</b></p> <p>A wider Clean Air Strategy and Action Plan has been developed to satisfy the requirements of LAQM. The strategy includes measures that will likely provide further AQ improvements including AQMA's.</p>			<p><b>TARGET RISK RATING AFTER ACTIONS BELOW - C3 = POSSIBLE/ MODERATE</b></p> <p><b>'Implement Clean Air Plan</b></p> <ul style="list-style-type: none"> <li>• Package of measures as detailed in Final Plan:</li> <li>• Vortex sensors - final positions to be agreed and installation programmed for <b>Q1/Q2 2022</b></li> <li>• Ongoing monitoring and assessment of AQ levels (<b>Ongoing</b>)</li> <li>• Completion of Wood St/ Central Square scheme - <b>Q1 22/23</b></li> <li>• Taxi scheme launch subject to political approval - <b>date TBC Q1/Q2 22/23</b></li> <li>• Further assessment on Castle Street to undertake more detailed modelling on revised scheme - ongoing dialogue with WG re timescales with proposed dates set out as follows:               <ul style="list-style-type: none"> <li>• <b>October 2022</b> – 12 months from introduction of current scheme – completion of data collection and further modelling post COVID -19</li> <li>• <b>Jan 2023</b> Completion of data/modelling assessment, identification of preferred option and production of a Cabinet Report for decision.</li> <li>• <b>May 2023</b> Complete the tender process and New Cabinet Paper (to award Tender)</li> <li>• <b>June 2023</b> On site (with the road closed - this will be achieving compliance)</li> <li>• <b>June 2024</b> Castle St scheme completed</li> </ul> </li> <li>• Finalisation of Monitoring Plan and agreed mitigation measures if Target Values are exceeded on annualised data.</li> </ul> <p><b>Clean Air Strategy and Action Plan</b></p> <ul style="list-style-type: none"> <li>• Roll out of measures (subject to grant bids/ funding)               <ul style="list-style-type: none"> <li>- Pilot project Non Idling Zones – Work with WG and Active travel team on potential, targeted around schools – <b>Q2-Q3 2022</b></li> <li>- Living Walls and other Green Infrastructure – <b>Q1-Q4</b> ongoing work with two new Green Wall Projects in conjunction with colleagues in Parks -Ysgol Mynydd Bychan and Birchgrove Primary Green wall project. This is in addition to ongoing monitoring of two other green wall projects at Kitchener Primary School and Dusty Forge Centre.</li> <li>- Progression of EV Infrastructure - <b>Q2-Q4</b></li> <li>- Update Air Quality Planning Guidance</li> <li>- Schools Active Travel - <b>Q1-Q4</b> continued support on TRO projects and expansion of project.</li> <li>- Behavioural Change Promotion, Car Free Day - Consideration of an event for Car Free day September 22 and for future Clean Air Days Consolidation of a dedicated Behavioural Change Programme linked to the Behavioural Change Strategy to be developed for One Planet Cardiff. (<b>Ongoing</b>)</li> </ul> </li> </ul>									
	<b>Type(s) of Impact</b>			<b>Linked Risks</b>									
	<ul style="list-style-type: none"> <li>• Health</li> <li>• Regulatory</li> <li>• Financial</li> <li>• Strategic</li> </ul>	<ul style="list-style-type: none"> <li>• Reputational</li> </ul>		<ul style="list-style-type: none"> <li>• Implementation Plan for measures (funding dependent)</li> <li>• Monitoring and Evaluation Plan for Clean Air Plan</li> <li>• Ongoing monitoring and reporting under LAQM</li> </ul>									

Tudalen 799

# City Security

**Description**  
Major security-related incident in 'crowded places' as a result of international or domestic terrorism.

**Potential Impact(s)**

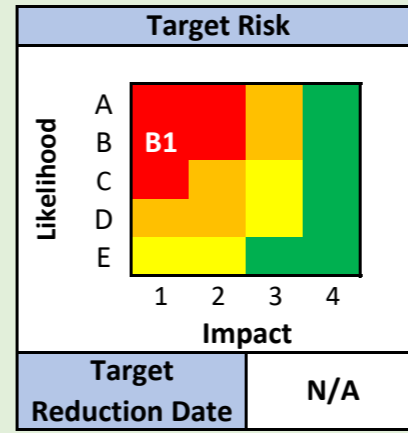
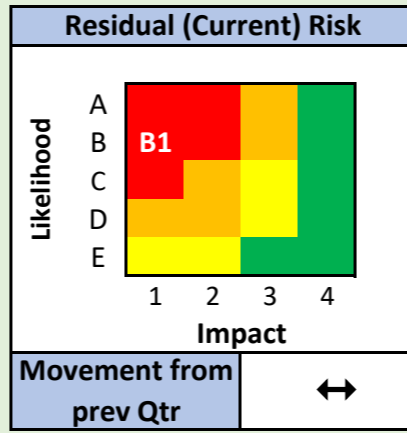
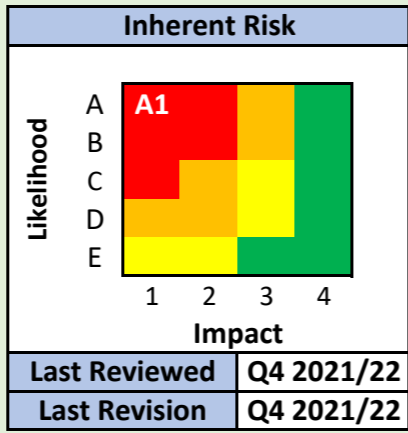
**Immediate / Short-Term**

- Large numbers of fatalities, injuries to public
- Extensive structural damage and/or collapse of buildings
- Closure of roads having impact on transport network and access to businesses and properties.
- Damage/disruption to utilities (gas, electricity, water etc.)
- Immediate impact to core business, retail and sporting district in the centre of Cardiff

**Ongoing / Longer Term**

- Reputational risk due to a public perception Cardiff is an unsafe place
- Area viewed as a risk for potential future business investment.
- Inability to attract major future national and international events (political, sporting etc.)
- Increase in demand for Council services/support for all affected.
- Current economic climate to reduce the effectiveness of any recovery/regeneration of the area.

Type(s) of Impact	
<ul style="list-style-type: none"> <li>• Service Delivery</li> <li>• Reputational</li> <li>• Legal</li> <li>• Financial</li> </ul>	<ul style="list-style-type: none"> <li>• Health &amp; Safety</li> <li>• Partnership</li> <li>• Community &amp; Environment</li> <li>• Stakeholder</li> </ul>



**Risk Owner(s)**

Chris Lee  
(Gavin Macho)

Andrew Gregory

Councillor Huw Thomas  
Leader

**What we've done/are currently doing to achieve the Residual Risk Rating**

- All existing identified high-risk, crowded places have been formally assessed
- Some crowded places have an extremely limited and in some cases 'third party managed' access control process to operate them; providing little/no challenge
- CONTEST Protect/Prepare Task & Finish Group maintains the City Gateways Public Realm Enhancement Scheme, with agreed options for suitable PAS 68/69 mitigation for appropriate boundary locations; referred to as 'gateways'
- The work done in the city to address security concerns has been predominantly focused on the provision of physical assets to mitigate against the threat of hostile vehicles
- Areas protected against the threat of hostile vehicles include the Principality Stadium, St Mary Street, Queen Street, St David's Dewi Sant and Cardiff Bay.
- The Cardiff City Centre Access Control Protocol is currently operating at the heightened response level, reflecting the UK National Threat Level; permitting vehicles onto the pedestrianised areas within Cardiff City Centre using strict parameters
- The Cardiff PSPG is chaired by the Chief Executive and meets every 3 months. It has commissioned a major strategic review of all City Centre Security matters with reference to how existing arrangements will fit into the new developments coming online. A Cardiff Infrastructure Report, how we currently manage security infrastructure in the city centre, has been put together. This includes recommendations/ prioritising interventions, as well as input and feedback from key stakeholders. A summary of the report was presented at the PSPG meeting in January 2022. This led to a Strategic oversight meeting and that in turn has led to a meeting with Senior Welsh Government to discuss potential funding methods.
- In the Queen's speech delivered this month, May 2022, it was announced that the CONTEST Act would be going through Parliament. This will create a statutory duty for Counter Terrorism preparedness to be undertaken across all City Centres across the UK. Cardiff Council along with the Wales Extremism Counter Terrorism Unit (WECTU), FOR Cardiff and Cardiff Council City Centre Management have formed a security partnership which will be driving the adoption of the outcome of the Protect Act.

**What we plan to do to meet target**

- The PSPG Chair has commissioned a Director led review across all relevant Service areas to assess current operational and tactical arrangements for City Security to see if they are effective. All opportunities for improvement to be captured and costed. **ONGOING**
- The PSPG is broadening its remit by taking on a more comprehensive portfolio of security issues inclusive of Cyber Security, Insider threat and personal security. Training and development being planned, projects managed at director level. **ONGOING**
- Consideration to be given to incorporating structured and strategic conversations about security and counter terrorism into pre application stage of major developments. **ONGOING**
- The PSPG will try to engage with Government to find funding to improve and develop Cardiff's security arrangement. Shovel ready projects ready to go. **ONGOING**
- **Q1** Security Partnership to deliver an awareness event for City Centre Partners to introduce Protect Act. **Q2** With the Security Partnership, we will separate out the City into Security Zones. **Q3** With the Security Partnership, information and materials will be produced for City Centre Partners. **Q4** The Security Partnership will develop training and awareness products for City Centre Partners.

**Linked Risks**

**Key Indicators / Measures used to monitor the risk**

- National Threat Level and period at level
- No of 'Crowded Places' not protected to PAS 68/69 level

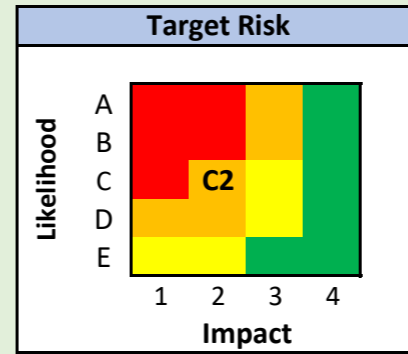
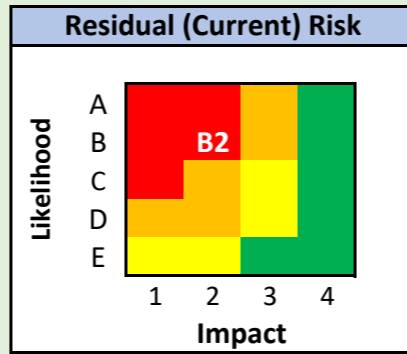
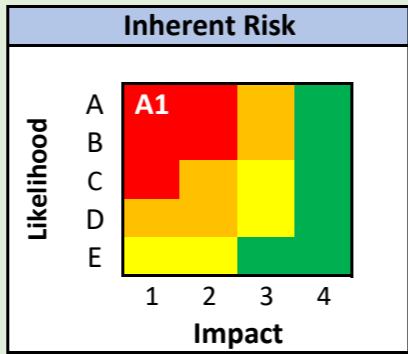
# Climate Change & Energy Security

**Description**  
Cardiff is not able to manage the effects of climate change and energy security due to lack of future proofing for key (social and civil) infrastructure and business development.

**Potential Impact(s)**

- Flood & Storm**
- Loss of life and risk to life
  - Direct damage to property, utilities and critical infrastructure
  - Blight of Land and Development
  - Disruption to service delivery
  - Contamination and disease from flood and sewer water and flood on contaminated land
  - Increase in health issues
  - Break up of community and social cohesion
  - Increase cost of insurance
  - Migration of ecosystems
  - Inconsistent energy supply
  - Increased costs
  - Inability to deliver public services
  - Decrease in economic output
  - Disruption to the supply of utilities
  - Increased fuel poverty

Type(s) of Impact	
<ul style="list-style-type: none"> <li>• Service Delivery</li> <li>• Reputational</li> <li>• Legal</li> <li>• Financial</li> </ul>	<ul style="list-style-type: none"> <li>• Health &amp; Safety</li> <li>• Partnership</li> <li>• Community &amp; Environment</li> <li>• Stakeholder</li> </ul>



Last Reviewed	Q4 2021/22
Last Revision	Q4 2021/22

Movement from prev Qtr	↔
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Target Reduction Date	2022/23
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**What we've done/are currently doing to achieve the Residual Risk Rating**

The Council has declared a Climate Emergency and instigated a One Planet Cardiff Strategy as its strategic response to this.

The following specific risk areas have been identified:

- COASTAL EROSION (see separate tab for details)
- FLOODING
- EXTREME WEATHER
- ENERGY SECURITY & DECARBONISATION
- BIODIVERSITY

**Linked Risks**

- Coastal Erosion
- Air Quality
- Business Continuity

**Linked Documents**

- <https://www.evaccardiff.co.uk/>
- <https://www.cdp.net/en>

Risk Owner(s)	
Andrew Gregory	Councillor Michael Michael Clean Streets, Recycling and Environment

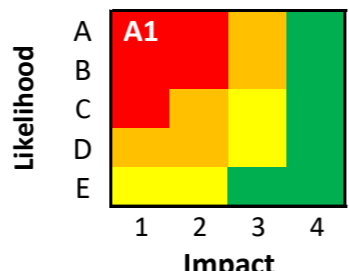
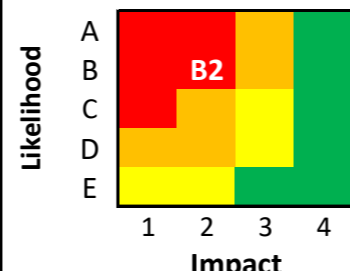
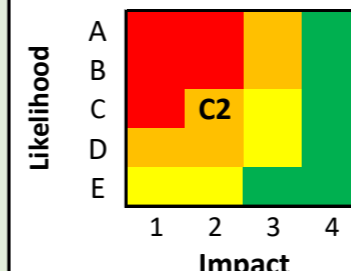
**What we plan to do to meet target**

- Develop strategic response to the Climate Emergency Declaration to incorporate carbon neutral target.
- See separate tabs for details
- COASTAL EROSION
- FLOODING
- EXTREME WEATHER
- ENERGY SECURITY & DECARBONISATION
- BIODIVERSITY

**Key Indicators / Measures used to monitor the risk**

- Storm Events that meet silver & gold emergency intervention
- Annual number of flooded properties and severity (statutory reporting)
- Energy use / renewable energy production of Cardiff Council

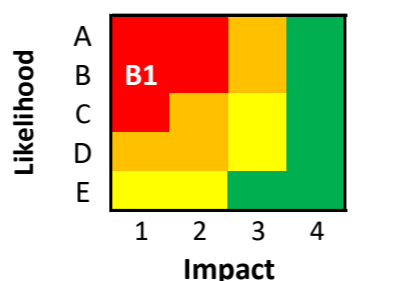
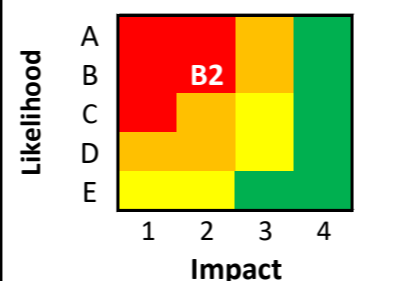
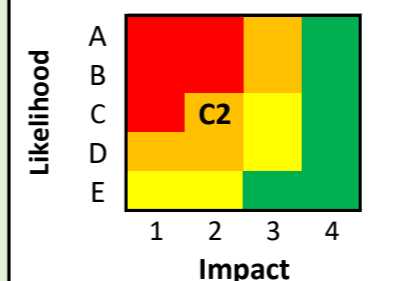
## Climate Change - Biodiversity

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)							
<p>Cardiff is not able to manage the effects of climate change and energy security due to lack of future proofing for key (social and civil) infrastructure and business development.</p>				<p style="text-align: center;"><b>Andrew Gregory</b> (James Clemence/ Simon Gilbert/ Matthew Harris/ Jon Maidment)</p> <p style="text-align: center;"><b>Councillor Michael Michael</b> Clean Streets, Recycling and Environment</p>							
<p><b>Potential Impact(s)</b></p> <ul style="list-style-type: none"> <li>Loss of biodiversity leads to reduction in ecosystem resilience, and reduction in ecosystem resilience will compromise the provision of ecosystem services. These are the services or benefits which we gain from the natural environment.</li> <li>Ecosystem services include climate change mitigation and adaptation.</li> <li>Climate change mitigation includes the sequestration and storage of carbon by plants, especially long-lived species such as trees. Reduction of this ecosystem service makes it harder to reduce net carbon emissions. Annually Cardiff's trees (not including other aspects of green infrastructure) provide ecosystem services worth £3.31 million, of which £1.9 million is in carbon storage and sequestration (iTree Study, Sept 2018).</li> <li>Climate change adaptation services include storm water attenuation by vegetation and reduction of surface water volume through evapotranspiration</li> <li>Trees, green walls and green roofs allow cooling and shading, thereby mitigating the urban heat island effect which may become more prevalent with a warmer climate.</li> <li>Hotter summers also increase risk of aerial pollution through air stagnation, and green infrastructure can remove certain pollutants from the air as well as having a cooling effect.</li> <li>The National Priorities of the WG Natural Resources Policy include 'Delivering Nature-based Solutions'. Failure to ensure protection of biodiversity and ecosystem resilience risks failure to deliver these nature-based solutions, which include climate change mitigation and adaptation.</li> </ul>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;"><b>Last Reviewed</b></td> <td style="width: 50%;">Q4 2021/22</td> </tr> <tr> <td><b>Last Revision</b></td> <td>Q4 2021/22</td> </tr> </table>	<b>Last Reviewed</b>	Q4 2021/22	<b>Last Revision</b>	Q4 2021/22	<p><b>Movement from prev Qtr</b></p> <p style="text-align: center;">↔</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;"><b>Target Reduction Date</b></td> <td style="width: 50%;">2022/23</td> </tr> </table>	<b>Target Reduction Date</b>	2022/23		
<b>Last Reviewed</b>	Q4 2021/22										
<b>Last Revision</b>	Q4 2021/22										
<b>Target Reduction Date</b>	2022/23										
<b>What we've done/are currently doing to achieve the Residual Risk Rating</b>				<b>What we plan to do to meet target</b>							
<ul style="list-style-type: none"> <li>Cabinet Report of 14/10/21 Recommended the Council sign the Edinburgh Declaration.</li> <li>Developed a Biodiversity and Resilience of Ecosystems Duty Forward Plan, to implement the statutory duty to seek to maintain and enhance biodiversity and in doing so to promote ecosystem resilience.</li> <li>Undertaken an 'iTree-Eco' study to look at the value of trees in terms of the ecosystem services that they provide.</li> <li>Working with neighbouring Local Authorities through the Local Nature Partnership Cymru project to share ideas and best practise for enhancing biodiversity across the City and identifying opportunities for cross-boundary projects to improve habitat and species connectivity and increase ecosystem resilience.</li> <li>Contributed to the Central South Wales Area Statement recently published by Natural Resources Wales.</li> <li>In September 2021 the Council agreed the Vision, Issues and Objectives for the new LDP.</li> </ul> <p>Objective 10 is: "To ensure the resilience of ecosystems by protecting and enhancing Cardiff's Green and blue Infrastructure, its biodiversity and other natural assets."</p> <ul style="list-style-type: none"> <li>The Coed Caerdydd Project has also resulted in further officer resource to support volunteer activity relating to tree planting and maintenance / aftercare and whereby grant funding has enabled the appointment of a Volunteer Co-ordinator on a fixed term contract up until July 2023.</li> <li>Funding secured for addition Grade 9 Principal Planner Ecologist/Green Infrastructure post in the Planning Service. However, recruitment of replacement G7 Planner (Ecology) failed to find suitable candidates in Q4 2021/22.</li> <li>External Consultants appointed temporarily to provide expert ecological advice for planning applications as an interim measure to deliver regulatory planning functions</li> <li>Further funding has been obtained which has resulted in the LNP Co-ordinator post being extended at full time hours up until 31/3/23. This funding has also enabled the creation of a temporary Community Ranger Post until 31/3/23 to assist with the delivery of Local Places for Nature funded Projects.</li> </ul>				<ul style="list-style-type: none"> <li>Review the Cardiff Local Development Plan including review of Designations and updated Habitat Regulations Assessment - <b>Q1 2022/23</b></li> <li>Update the Cardiff Biodiversity and Resilience of Ecosystems Duty Forward Plan, including the Action Plan, in 2022 in line with legislative requirements - <b>Q4 2022/23</b></li> <li>Recruitment of Principal Ecologist and vacant Planner (ecology) post - <b>Q2 2022/23</b></li> <li>Officer attendance at all Wales Planning and Diversity Forum - <b>Q1, Q2, Q3, Q4 2022/23</b></li> <li>Regular meetings of Council "Green Infrastructure Officer Group" including colleagues from Planning, Parks, Drainage, and Public Rights of Way - <b>ONGOING</b></li> <li>Seek opportunities for partnership working under the 5 main themes of the South Wales Area Statement (building resilient ecosystems, working with water, connecting people with nature, improving our health, improving our air quality). - <b>Q4 2022/23</b></li> <li>Develop the local Nature Recovery Action Plan through the Local Nature Partnership (LNP) - <b>Q4 2022/23</b></li> <li>Discussions between the Council, Welsh Government and the Wales Council for Voluntary Action concerning LNP grant funding for a further 2 years is ongoing. - <b>Q4 2022/23</b></li> </ul>							
<b>Type(s) of Impact</b>		<b>Linked Risks</b>	<b>Linked Documents</b>		<b>Key Indicators / Measures used to monitor the risk</b>						
<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> <li>Health &amp; Safety</li> <li>Partnership</li> <li>Community &amp; Environment</li> <li>Stakeholder</li> </ul>		<p>Coastal Erosion</p> <p>Air Quality</p> <p>Business Continuity</p> <p>Energy decarbonisation</p>	<p><a href="https://www.evaccardiff.co.uk/">https://www.evaccardiff.co.uk/</a></p> <p><a href="https://www.cdp.net/en">https://www.cdp.net/en</a></p>		<p>Extent of Green Infrastructure in the City.</p>						

Updated 002



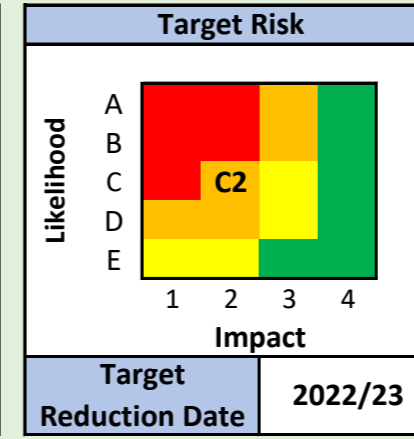
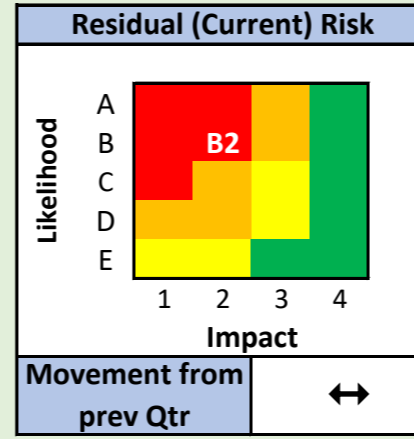
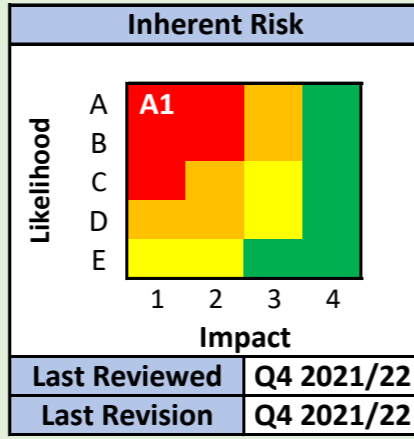
# Climate Change - Energy Security & Decarbonisation

Description		Inherent Risk		Residual (Current) Risk		Target Risk		Risk Owner(s)	
Cardiff is not able to manage the effects of climate change and energy security due to lack of future proofing for key (social and civil) infrastructure and business development.								<p style="text-align: center;"><b>Andrew Gregory</b> (Gareth Harcombe/ Liz Lambert)</p> <p style="text-align: center;"><b>Councillor Michael Michael</b> Clean Streets, Recycling and Environment</p>	
Potential Impact(s)		Last Reviewed		Last Revision		Movement from prev Qtr		Target Reduction Date	
<p><b>Energy security (energy efficiency &amp; decarbonisation of supply)</b></p> <ul style="list-style-type: none"> <li>Inconsistent energy supply</li> <li>Increased costs</li> <li>Inability to deliver public services</li> <li>Decrease in economic output</li> <li>Disruption to the supply of utilities</li> <li>Increased transport costs</li> <li>Increased costs for heating / providing services to buildings</li> <li>Increased fuel poverty</li> </ul>		Q4 2021/22		Q4 2021/22		↔		2022/23	
Type(s) of Impact		Linked Risks		Linked Documents		What we've done/are currently doing to achieve the Residual Risk Rating			
<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> <li>Health &amp; Safety</li> <li>Partnership</li> <li>Community &amp; Environment</li> <li>Stakeholder</li> </ul>		Coastal Erosion Air Quality Business Continuity		<a href="https://www.evaccardiff.co.uk/">https://www.evaccardiff.co.uk/</a> <a href="https://www.cdp.net/en">https://www.cdp.net/en</a>		<p><b>Energy security (energy efficiency &amp; decarbonisation of supply)</b></p> <ul style="list-style-type: none"> <li>Climate Emergency Declared by Council</li> <li>Council approved the final "One Planet Cardiff" Strategy on October 14th 2021 which addresses the Climate emergency and sets a pathway to a carbon neutral Council by 2030.</li> <li>Established internal and external partnership and governance boards to steer our response to the climate emergency.</li> <li>Energy efficiency measures being installed through Re-Fit and Salix projects - Now managed by FM</li> <li>Phase 2 of Re-Fit project finalised and going through due diligence with Salix funding organisations - Schools focus for this tranche</li> <li>NPS Consortium approach to purchasing energy to secure best prices - continuing by Economic Development</li> <li>Lamby Way solar farm complete including the private wire connection to the Welsh Water Waste Treatment Works.</li> <li>District Heat Network - Construction commenced on site in Jan 22 with a 3 year programme to completion</li> <li>Carbon baselining and impact modelling reported to Welsh Govt and included in One Planet Cardiff. This has been used to inform the priorities in the action plan and progress will be monitored and reported annually.</li> <li>Scoping additional carbon reduction projects for future action as part of the One Planet Cardiff project with key target areas confirmed in the One Planet Cardiff Action Plan</li> <li>Delivering Low Emission Transport Strategy - approved April 2018 and implementation of action plan underway:                             <ul style="list-style-type: none"> <li>first tranche of residential chargers delivered, and second tranche now finalised</li> <li>WG funding secured to install EV chargers at council buildings for small fleet vehicles</li> <li>ULEVTF funding secured to install charging infrastructure in car parks and additional in-year funding awarded to implement Rapid charging infrastructure at Lamby Way depot for 12 electric refuse collection vehicles, and to engage consultant/ specialist to scope/design &amp; specification for renewable connection &amp; switch gear to produce green energy from landfill gas and/or the solar farm.</li> </ul> </li> <li>Working with the Cardiff City Region to develop a new domestic retrofit grant scheme using Energy Company Obligation funding. Plans for a major energy retrofit of council owned low-rise domestic blocks also in preparation and Welsh Government ARBED grant funding being targeted at "Hard to Treat" steel framed properties for implementation later this year.</li> <li>OPC commits to a long term strategy for public engagement and behaviour change to build public resilience and positive action through advice and guidance and based on best practice and observed impact of initiatives elsewhere. This work is guided by advice from the Centre for Climate Change &amp; Social Transformations (CAST) .</li> </ul>			
Key Indicators / Measures used to monitor the risk		What we plan to do to meet target							
Energy use / renewable energy production of Cardiff Council		<p><b>Energy security (energy efficiency &amp; decarbonisation of supply)</b></p> <ul style="list-style-type: none"> <li>Implement and monitor the One Planet Cardiff Strategy with carbon reduction targets and associated action plan for delivery over the to 2030 - Overall target March 2030 with specific project based targets stated in the detailed action plan <b>ONGOING</b></li> <li>Implement "Mission Statements" to secure low/zero carbon development and retrofit in the Council's Estate - (Strategic Estates/ Schools/ Housing) by <b>2024</b></li> <li>Promote and implement the approved policy position to guide new private sector development in the city - Ongoing - Relates to the Planning/development control process <b>ONGOING</b></li> <li>Complete Phase 1 of the Cardiff District Heat Network – by <b>Q4 2023/24</b></li> <li>Develop a pipeline of new renewable generation assets for cabinet approval in 22/23 - by <b>Q4 2022/23</b></li> <li>Seek ways to accelerate housing energy efficiency and retrofit schemes across the city and possibly the region as part of the One Planet Cardiff project - Develop options and a position paper by <b>Q4 2022/23</b></li> <li>Electric Vehicle strategy - Proposals to convert council fleet to electric being reviewed/ assessed to allow for impact of Covid-19 and changes to requirements/ working practices <b>ONGOING</b></li> <li>Integrate sustainable travel and energy efficiency thinking into the new proposals for Hybrid Working - Hybrid working policy expected by <b>Q4 2022/23</b> (Economic Development lead)</li> </ul>							

Tudalen 803

# Climate Change - Extreme Weather

**Description**  
Cardiff is not able to manage the effects of climate change and energy security due to lack of future proofing for key (social and civil) infrastructure and business development.



**Risk Owner(s)**

**Andrew Gregory**  
(EMU/Gary Brown)

**Councillor Michael Michael**  
Clean Streets, Recycling and Environment

- Potential Impact(s)**
- Loss of life and risk to life
  - Damage to infrastructure & utilities
  - Service delivery
  - Increase in health related issues including air quality
  - Blight of development
  - Migration of ecosystems

**What we've done/are currently doing to achieve the Residual Risk Rating**

**The Council has declared a Climate Emergency**

**Extreme Heat**

- Working with Partners in the LRF to warn them of anticipated heatwave impacts upon vulnerable groups and support response to such a risk
- Supporting the enhancement of the public's own resilience through advice and guidance available from the EVAC Cardiff Website

**Extreme Cold/ Snow**

- Implementation of Council's Cold Weather Response Plans
- Winter Service review undertaken to consider the potential impact of Covid-19:
  - concentration made to build resilience into Winter Service as high risk to staff resource due to illness and the requirements of isolation
  - required training and staff rotas put in place, however there is a limited available resource with the required skillsets within the authority
  - investigations into feasibility/ availability of external assistance

**What we plan to do to meet target**

**Extreme Heat**

- Develop a 20 year heat mitigation strategy for the city. Working with partner agencies and commercial stakeholders to support development of heat reduction programmes.- **2023/24**
- Engage with Welsh Government with in WLGA, and PSB to ensure consistent support in managing this risk ensuring the planning process works for all stakeholders to ensure we develop sustainable planning strategy's for future developments, planning the management of this risk (WG Technical Advice Note (TAN) 15) - a new updated Technical Advice Note TAN 15 is due to be published in **June 2023**

**Extreme Cold/ Snow**

- Investigate further whether external assistance can be utilised/is available to build future resilience - risk remains for disruption to the service next winter if the current pandemic continues/ other new external factors emerge - **2023/24**

- Type(s) of Impact**
- Service Delivery
  - Reputational
  - Legal
  - Financial
  - Health & Safety
  - Partnership
  - Community & Environment
  - Stakeholder

**Linked Risks**

Coastal Erosion  
Air Quality  
Business Continuity

**Linked Documents**

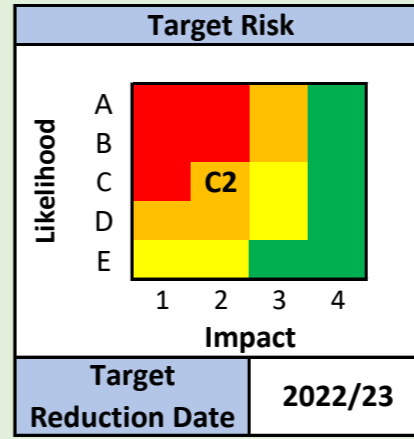
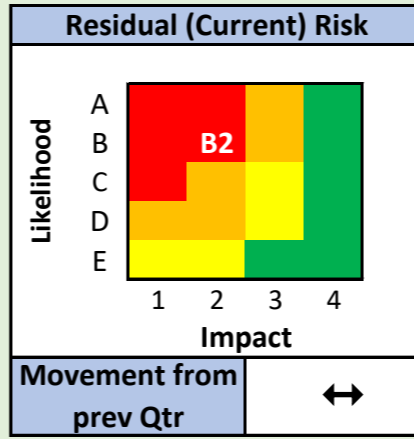
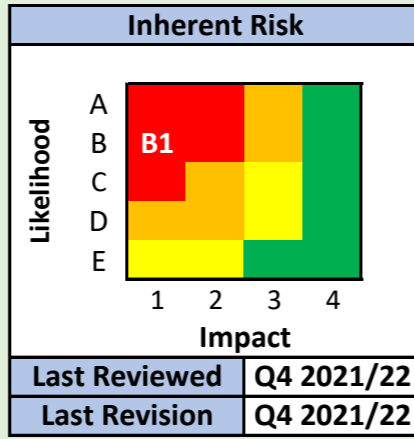
<https://www.evaccardiff.co.uk/>  
<https://www.cdp.net/en>

**Key Indicators / Measures used to monitor the risk**

Tudalen 804

# Climate Change - Flooding

**Description**  
Cardiff is not able to manage the effects of climate change and energy security due to lack of future proofing for key (social and civil) infrastructure and business development.



**Risk Owner(s)**

**Andrew Gregory**  
(Gary Brown/ David Brain  
James Clemence/ Stuart  
Williams)

**Councillor Michael Michael**  
Clean Streets, Recycling and  
Environment

**Potential Impact(s)**

**Flood & Storm**

- Loss of life and risk to life
- Direct damage to property, utilities and critical infrastructure
- Blight of Land and Development
- Disruption to service delivery
- Contamination and disease from flood and sewer water and flood on contaminated land
- Increase in health issues
- Break up of community and social cohesion
- Increase cost of insurance
- Migration of ecosystems

Tudalen 505

**What we've done/are currently doing to achieve the Residual Risk Rating**

The Council has declared a Climate Emergency

**Flood & Storm**

- Working with partners within the Local Resilience Forum (LRF) to support the management of this risk including supporting the emergency response to this risk
- Supporting the enhancement of the public's own resilience through advice and guidance available from the EVAC Cardiff Website
- Implementation of Schedule 3 of the Flood and Water Management Act 2010 requires all new development over 100m2 to implement sustainable drainage, resilient to flooding
- We have introduced Flood Incident Management software to provide better understanding of spatial distribution of flood events filtered by source, and determine priority areas for future flood alleviation schemes to be implemented (subject to WG funding bid opportunities). Successful funding bids were submitted and funding awarded in 20/21 for Business Justification Cases for a number of these schemes, with grant funding also now awarded for 21/22 for continuation of these schemes.
- Applications to WG were successful for grant funding in 2021/22 to support studies and implementation of localised flood prevention schemes.
- Ongoing CCTV and asset capture work taking place in drainage networks to review high risk areas.
- Asset management - Delivery of Flood Management and Coastal Improvement Schemes and rationalise/ prioritise gully maintenance schedule based on the outputs of the Flood Incident Management software - Phase 1 of new gully maintenance schedule completed.

**What we plan to do to meet target**

**Flood & Storm**

The following actions are ongoing :

- Develop, submit to Welsh Government and publish by October 2023, a combined Flood Risk Management Strategy and Flood Risk Management Plan as required by The Flood and Water Management Act (2010) and The Flood Risk Regulations (2009) respectively **ONGOING**
- Develop enhanced engagement programme with partners supporting the public in enhancing their own resilience - this will be a key aspect of the above Plan - initial discussions with Dwr Cymru/Welsh Water and Natural Resources Wales (NRW) have taken place **Q3 2022/23**
- Improve communication on what to do in a flood and raise awareness of risk - as above - initial talks underway to produce a role & responsibilities video, as well as flood safety guidance in co-operation with Dwr Cymru/Welsh Water, NRW and Blue Light organisations **ONGOING**
- Improve the service provided by the SuDS Approval Body (SAB) - ongoing - improvements planned with additional resource Recruitment process commenced and due to be implemented in **Q1 2022/23**
- Deliver guidance to increase standards and ease of development - in development
- Asset management - **ONGOING**
- Develop Flood Risk Management Strategy **ONGOING**

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>• Service Delivery</li> <li>• Reputational</li> <li>• Legal</li> <li>• Financial</li> </ul>	<ul style="list-style-type: none"> <li>• Health &amp; Safety</li> <li>• Partnership</li> <li>• Community &amp; Environment</li> <li>• Stakeholder</li> </ul>
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**Linked Risks**

Coastal Erosion  
Air Quality  
Business Continuity

**Linked Documents**

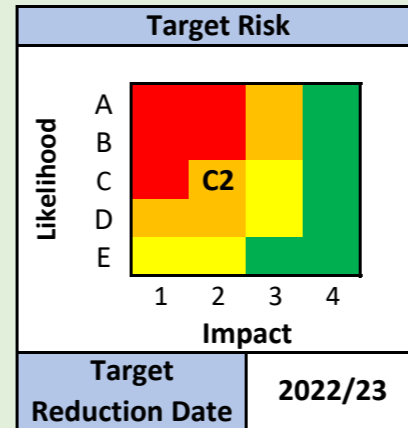
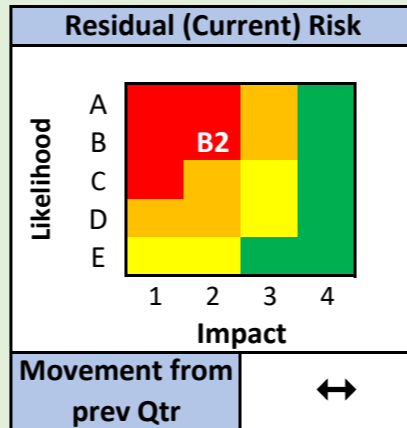
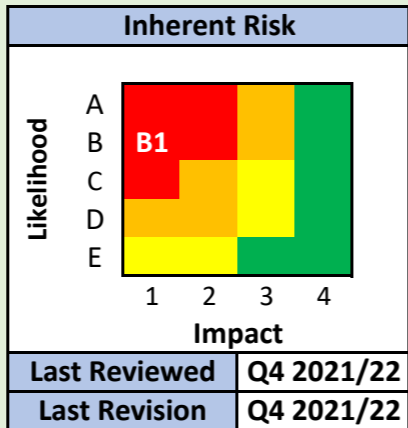
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**Key Indicators / Measures used to monitor the risk**

Storm Events that meet silver & gold emergency intervention  
Annual number of flooded properties and severity (statutory reporting)  
Energy use / renewable energy production of Cardiff Council

# Coastal Erosion

**Description**  
Breach of current defences resulting in widespread flooding (current defences are ad hoc and are in a very poor condition)



**Risk Owner(s)**

**Andrew Gregory**  
(Gary Brown/ David Brain)

**Councillor Michael Michael**  
Clean Streets, Recycling and Environment

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Incident management arrangements are in place, which whilst not preventative, represent a level of emergency management for a flood and coastal erosion risk event occurring in a significant storm event.

**Coastal Defence Scheme:**

- The Flood Risk Management Team are undertaking detailed design for the coastal defence scheme - the necessary works are holistic and cannot be phased, therefore residual risk rating cannot be lowered until the completed construction of the coastal defence scheme in its entirety.
- The inundation risk will be improved by implementing the coastal defence scheme, which will provide defence for a 1 in 200 year severe weather event, plus an allowance for climate change influence of 40%.
- The total costs associated with the Design, Early Contractor Engagement and Construction phases were originally estimated at £10.9m (Welsh Government 75% funding = £8.2m and CCC 25% funding = £2.7m)
- Formal application was submitted to Welsh Government (WG) under the WG Coastal Risk Management Programme and development of the Detailed Design and Full Business Case (FBC) was programmed for completion in May 2020, however was impacted by Covid-19.
- Work ongoing with Emergency Management to formulate interim measures.
- Detailed design and full business case ongoing

**Scheme Delivery Progress update:**

- the principle design for the coastal protection scheme and the requirements within the draft full business case to be submitted to WG for the Coastal Risk Management Programme be noted
- the procurement approach and evaluation criteria/weightings set out in the report be approved
- the commencement of procurement for the construction contract to deliver the coastal defence improvements estimated at £23.5M be approved
- a further report be presented to Cabinet with the final Full Business Case, including final tender costs, project risks and mitigations.

- Draft Full Business Case submitted to WG & refined as necessary - final WG approval & funding confirmation anticipated by early 2022
- Extensions for timescales due to Covid 19 delays, and complexities of ground conditions and therefore design, agreed with WG - funding for FBC increased to cover additional costs (plus WG grant % increase) and extended to 16 March 2022.
- Costs associated with the Outline and Full Business Cases and Design now 100% funded by WG. To allow for increase of allowance for climate change to 40% and additional works required from ground investigation results, the construction phase is now estimated at £25M (WG 85% funding = £21.250M and CC 15% funding = £3.750M)
- PQQ procurement process completed and select list of 5 contractors established - required to submit returns in Jan 2022. Due to complexities of project, challenging environmental conditions for construction works and NRW requirements, extension for submission granted to mid Feb, with submission, assessment, selection and award process forecast to be completed early 2022.
- Marine Licence application submitted to NRW and required process followed. Although the Flood Risk Management Team have had prolonged and constructive dialogue with NRW staff, NRW have stated that for the Marine Licence to be granted, a derogation will be required to be signed off by Welsh Government Ministers under the process known as Imperative Reason of Overriding Public Interest (IROPI). This process has put the requirement to be on site by end of 21/22 financial year out of reach. WG were therefore contacted, meetings held and agreement secured for funding deadline to be further extended to 31st Aug 2022. This allows us to start on site in the new financial year, although we will still be pushing for the earliest possible start date.
- Tenders returned in Feb 2022 and although clarifications, advice and extensions of time were granted, only one contractor made a submission. The estimated costs of circa £30M, that included risk and optimism bias, was far exceeded and an estimated cost, including risk, of circa £40 - £45M was received.
- The Cabinet report to seek approval to award the contract to the successful contractor and commit to the 15% Council contribution was due to be entered into the March 2022 cabinet - due to the necessity to fully analyse and understand the submission and establish reasons for the significant increase, the March Cabinet Report was withdrawn.
- Further meetings with WG have taken place, they have expressed their concerns over the price increase and explanations have been presented. The funding for the east side would present an additional cost of circa £7 to 9M for Cardiff Council if it chose to protect the tip from erosion and coastal inundation.

**What we plan to do to meet target**

We will be designing & delivering an effective coastal flood protection scheme as a matter of priority - Anticipated construction starting 2022, with completion 2024.

**Key steps:**

- Planning permission and Marine licence required prior to cabinet report - Planning target date **Q2 2022/23**
- Cabinet report to award contract, including agreed approach with Corporate Finance on the funding for the scheme - **Q2 2022/23**
- Anticipated construction start - **Q3 2022/23**

**Potential Impact(s)**

- Continued coastal erosion along the coast threatening the Rover Way Traveller site and critical infrastructure including Rover Way and the Rover Way/Lamby Way roundabout
- Erosion to two decommissioned landfill sites, with risk of releasing landfill material into the Severn Estuary and having significant environmental impacts
- Flood risk to 1,116 residential and 72 non-residential properties over 100 years, including risk to life, property, infrastructure and services
- N.B. the predicted rates of erosion threaten the Rover Way Travellers Site and the adjacent electrical substation within 5 years, and further release of large volumes of unknown tip material from the Frag Tip into the Severn Estuary.

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Health</li> <li>Reputational</li> <li>Financial</li> </ul>	<ul style="list-style-type: none"> <li>Strategic</li> <li>Service Delivery</li> </ul>
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**Linked Risks**

Climate Change risks

**Key Indicators / Measures used to monitor the risk**

- Award of contract for detailed design and Full Business Case - achieved
- Completion of detailed design and Full Business Case by May 2020 & submitted to WG
- Delivery programme of coastal protection scheme

# Performance Management

**Description**

The risk that the Council's Performance Management arrangements do not provide timely performance information to allow the Council's political and managerial leadership to effectively deliver corporate priorities, statutory services or performance improvement

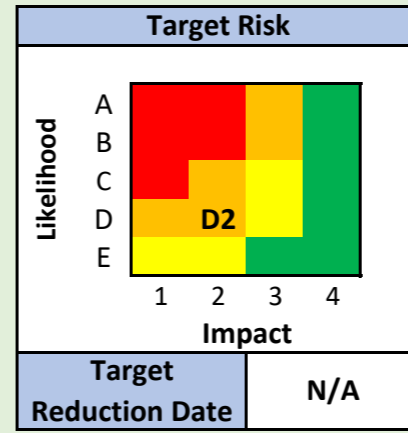
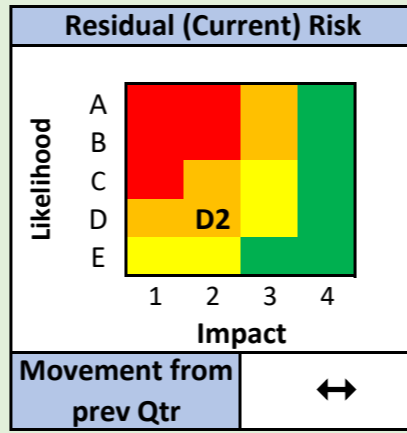
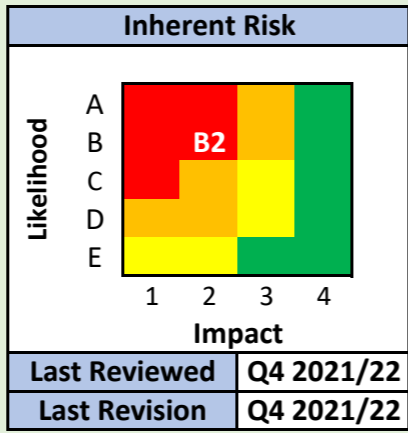
Performance Management arrangements are essential for discharging statutory requirements, delivering the administration's priorities and ensuring Council core business is delivered effectively. Weak corporate performance management arrangements heighten the risk of poor performance, service failure, financial overspend or legal non-compliance going unidentified, unchallenged and unresolved.

The Council must therefore maintain a focus on the Key Performance Indicators it has identified within the Corporate Plan as a pointer to overall organisational success. The Council must also ensure that more granular indicators of performance- the Council's Core Data which is managed by individual Directorates- are established and monitored to provide more detailed insight into the drivers of corporate performance.

Changes to the Statutory Performance Requirements have been set out in Local Government Bill and work is being undertaken to ensure the requirements are embedded in the Council's performance regime.

- Potential Impact(s)**
- Council unable to effectively deliver corporate priorities, statutory services or performance improvement
  - Failure to comply with performance duties set out in the Wellbeing of Future Generations Act and Local Government and Elections Act.
  - Compliance failure leading to external sanctions and reputational damage.

- Type(s) of Impact**
- Service Delivery
  - Reputational
  - Stakeholder



**What we've done/are currently doing to achieve the Residual Risk Rating**

In February 2022 Cabinet approved a strengthened Planning and Performance Framework, in response to the Local Government and Elections Act (Wales) 2021.

An internal Audit report on Performance Management, published in February 2022, provided an Audit Assurance of "Effective with Opportunity for Improvement". All recommendations were accepted.

In March 2022, the Audit Wales Assurance and Risk Assessment concluded that "The Council has made good progress in embedding new self assessment approaches into its routine governance arrangements"

**Linked Risks**

**Risk Owner(s)**

**Sarah McGill**  
(Gareth Newell)

**Councillor Chris Weaver**  
Finance, Modernisation and Performance

**What we plan to do to meet target**

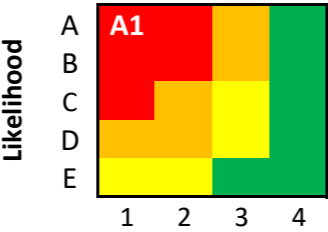
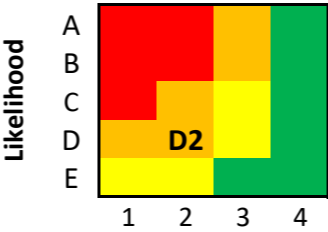
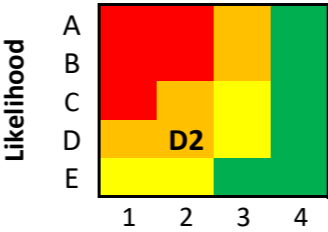
The recommendations of the internal Audit Report will be delivered, focusing on strengthened practice within Directorate Delivery Plans. **ONGOING**

Preparatory work will be undertaken in readiness for a Corporate Peer Assessment, a statutory requirement of the new Local Government and Elections (Wales) Act. **ONGOING**

**Key Indicators / Measures used to monitor the risk**

Quarterly monitoring of corporate plan indicators (108) provide a pointer to organisational health and corporate performance. Corporate Plan indicators are also risk assessed as part of the performance monitoring process.

# Budget Monitoring (Control)

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)	
<p>Failure to achieve the budget set, inclusive of budgeted spend and savings across Directorates, with increased use of emergency finance measures and the unplanned drawdown of reserves.</p>				<p><b>Chris Lee</b> (Ian Allwood)</p>	<p><b>Councillor Chris Weaver</b> Finance, Modernisation and Performance</p>
<p><b>Potential Impact(s)</b></p> <ul style="list-style-type: none"> <li>Inability to balance spend against budget, for the financial year</li> <li>Requirement to implement emergency measures to reduce spending during the financial year thus adversely impacting on ability to meet Corporate Plan objectives</li> <li>Requirement to draw down from General Reserves at the year end</li> </ul>	<p>Last Reviewed Q4 2021/22 Last Revision Q4 2021/22</p>	<p>Movement from prev Qtr ↓</p>	<p>Target Reduction Date Q4 2021/22</p>		
<p><b>What we've done/are currently doing to achieve the Residual Risk Rating</b></p>				<p><b>What we plan to do to meet target</b></p>	
<ul style="list-style-type: none"> <li>Clear financial procedure rules that reduce the level of risk of financial commitments being identified late in the financial year. The rules clearly set out the roles and responsibilities for budget management and are an area of interest for internal audit</li> <li>The year has seen monthly WG Hardship claims for additional expenditure and quarterly claims for lost income. Due diligence is in place to ensure that all claims are solely related to the pandemic and follow the terms and conditions of the claims process. Throughout year, the assumptions were reviewed accordingly to the circumstances at the time and the level of cost incurred or income deemed likely to be lost. These controls plus regular review with impacted service areas and a sign off process is in place to mitigate against the risk of any payback requirement at a future point.</li> <li>Loss of income claims are also reviewed to ensure that where applicable adjustments to pay back are made in a timely fashion.</li> <li>The Corporate Director of Resources, Chief Executive and Cabinet Members have held three challenge meetings in 2021/22 in order to ensure there remains a focus on understanding any impending financial matters and any mitigations needed to be put in place in order to improve / maintain the respective Directorate financial position where appropriate.</li> <li>Continued monitoring of exceptional price fluctuations in respect to Building, transport, energy and infrastructure materials in order to forecast the extent and duration of these pressures. Close working with Service areas in order to identify cost pressures and compensating mitigation strategies that impact on delivery of Capital Programme and repair schedules to ensure works remain within budget.</li> <li>Risk assessment process put in place for 2022/23 Capital Programme which will identify obstacles to cost and timescale thus encourage early mitigations.</li> </ul>				<p><b>2022/23 and the Medium Term</b></p> <ul style="list-style-type: none"> <li>Monitoring and review points put in place in order to ensure trends and actions are in place in respect to exceptional inflationary pressures that arise in the financial year 2022/23 <b>Q2 2022/23</b></li> <li>Monitor and review points put in place to consider risk assessments and mitigations for areas of capital spend. <b>Q3 2022/23</b></li> <li>Proceed with timetable to produce 2021/22 Final Outturn report to Cabinet in June and M4 2022/23 Report for Cabinet in September respectively. <b>Q1 and Q2 2022/23</b></li> </ul>	
<p><b>Type(s) of Impact</b></p>		<p><b>Linked Risks</b></p>		<p><b>Key Indicators / Measures used to monitor the risk</b></p>	
<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	<ul style="list-style-type: none"> <li>Stakeholder</li> </ul>	<p>Financial Resilience</p>		<ul style="list-style-type: none"> <li>Monthly Directorate Monitoring reports detailing likely outturn position and performance against savings accepted</li> <li>Review of use of earmarked reserves and balances - Half Yearly</li> <li>Amount of Hardship Support claimed successfully</li> </ul>	

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# Financial Resilience

**Description**

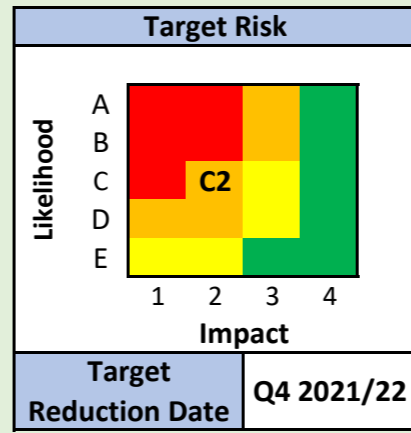
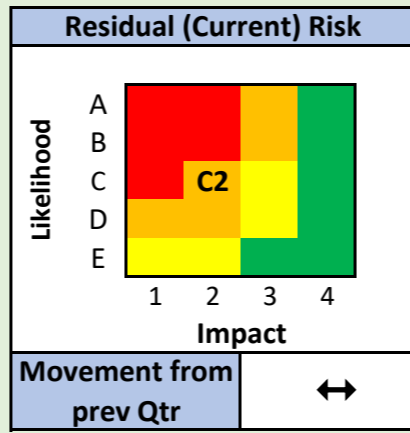
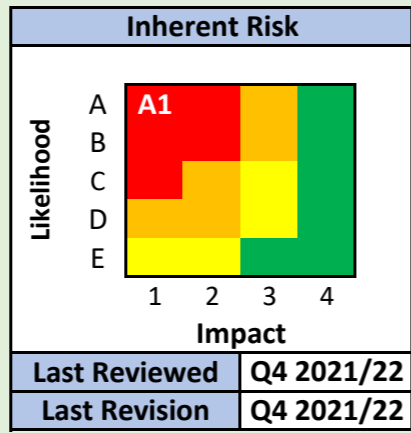
- Failure to deliver a balanced annual budget and a fully informed Medium Term Financial Plan.
- Lack of appropriate mechanisms to identify and manage unexpected financial liabilities.
- The current outlook is that there is a Budget Gap of £69 million for the period 2023/24 to 2026/27.

**Potential Impact(s)**

- Failing to meet statutory obligations and potential for service delivery to be adversely affected.
- Reaching the point where a s114 notice is required to be issued by the S151 Officer.
- Reputational damage to the Council.
- Needing to draw down significant unplanned amounts from reserves.
- Levels of borrowing become unsustainable.
- Inability to progress policy initiatives.
- Inability to manage adverse external factors - e.g. adverse settlements, WG rent policy etc.
- Financial constraints and budget proposals result in unintended consequences such as increased instances of non-compliance and financial impropriety.
- Requirement for significant savings at short notice that are therefore not identified in a coherent, strategic way and which impact on service delivery.
- Level of borrowing limits the ability of future generations to take forward new priorities.

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>• Service Delivery</li> <li>• Reputational</li> <li>• Legal</li> <li>• Financial</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder</li> </ul>
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**Risk Owner(s)**

<p><b>Chris Lee</b> (Ian Allwood)</p>	<p><b>Councillor</b> <b>Chris Weaver</b> Finance, Modernisation and Performance</p>
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**What we've done/are currently doing to achieve the Residual Risk Rating**

**2022/23 and Medium Term**

- Regular monitoring to understand the in-year position and gain early insight into emerging risks that need to be factored into the MTFP work.
- Engaging and working in partnership with directorates during the budget process to ensure that budget proposals and services are deliverable within timescales and quantum (revenue and capital)
- Mechanisms in place such as Treasury Management Reserve and Financial Resilience Mechanism in order to dampen the impact of a worse than anticipated financial climate / settlements.
- Preparation of Prudential Indicators and a local affordability indicator to help assess the affordability, prudence and sustainability of the capital programme and associated levels of borrowing
- Close alignment with Corporate Plan objectives, to ensure resources are allocated appropriately, and that longer term financial savings are developed in enough time to be realised.
- Regular review of contingent assets and liabilities, and provisions to ensure the Council has adequate cover for emerging liabilities.
- Robust monitoring of the impact of C19 and finalisation of all Hardship Claims to ensure all eligible items have been claimed prior to the ending of the Fund.
- An approved TM Strategy to mitigate risk - incorporates borrowing at fixed rates to reduce exposure to future interest rate fluctuations
- A Major Projects accountancy function supporting the identification of key risks / financial issues in relation to large schemes.
- Maintaining approach to robust financial control mechanisms and strengthening complex / areas of risk through training e.g. VAT.
- Undertaken initial assessment against CIPFA FM code with high level findings
- Work on establishing the financial implications to services both in the short, medium and long term because of the impact of the Covid 19 crisis, and detailed log of budgetary issues affecting 2022/23. This culminated in the inclusion within the 2022/23 Budget of a £10 million COVID Contingency Budget to protect the Council's resilience in light of the ending of the Hardship Fund on 31/3/22.

**What we plan to do to meet target**

**2022/23 and the Medium Term**

- Consider and take any opportunities to increase earmarked reserves in order to provide first line of defence against financial shocks. **Q2 2022/23**
- Review corporate approach to business case development, approval and post project monitoring to ensure expenditure assumed to pay for itself can do so over its expected life. **Q1 2022/23**
- Strengthening links between financial planning and asset management strategies, which consider the current condition of assets and future requirements. **Q3 2022/23**
- Identify clear, detailed plans and timescale for delivery of capital receipts targets. **Q3 2022/23**
- Enhance focus on a multi-year position (recognising limitations where settlement information is for one year only.) **Q3 2022/23**
- Review approach to governance and financial monitoring of special purpose vehicles to ensure liabilities and any financial guarantees are understood and are appropriate. **Q3 2022/23**
- Complete self-assessment against the CIPFA FM code and Balance Sheet Review and develop implementation plan in respect of any findings or recommendations, which provide further financial resilience. **Q3 2022/23**
- Confirm approach and reporting of commercial investments as part of standard monitoring processes and reports. **Q2 2022/23**
- Continue to keep cost pressures arising from BREXIT, supply chains issues and labour / skills shortages under review in terms of their impact on costs, inflation and interest rates and the impact of these for the MTFP and Capital Programme **QUARTERLY**
- Continue work to frame how the better than anticipated Local Government Settlement for 2022/23 can support financial resilience next financial year and beyond. **Q4 2022/23**
- Implement requirements, where relevant arising from CIPFA's 2021 update of the Prudential Code and Treasury Management Code. To include development of some of the listed indicators below with regards commercial investment. **Q4 2022/23**

**Linked Risks**

Budget Monitoring (Control)

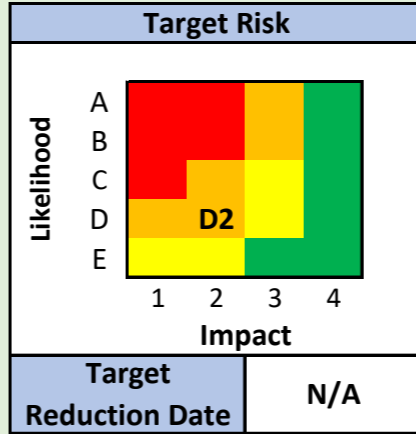
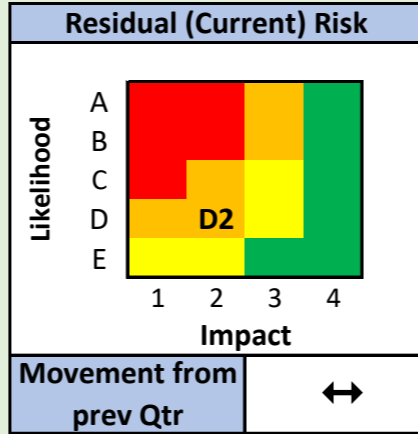
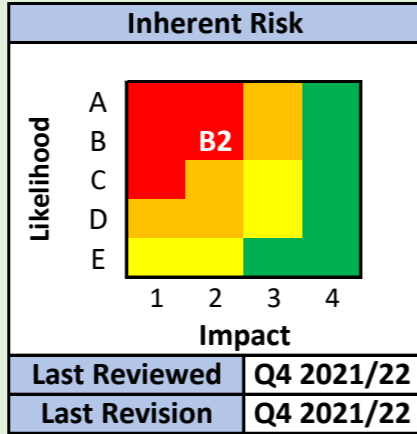
**Key Indicators / Measures used to monitor the risk**

- Financial Snapshot which highlights historical & current performance with regards budget monitoring, achievability of savings, levels of borrowing, and financial ratios.
- Outturn vs Budget: Main budget lines under or overspend as a % of budgeted expenditure.
- Delivery of planned savings: Total (£) unachieved planned savings as a % of total (£) planned savings.
- Use of reserves: 1) Ratio of useable reserves to Net Revenue Budget (NRB), 2) Amount of useable reserves used to balance budget as % of NRB.
- Council tax: 1) Council tax and other income as % of NRB, 2) Council tax collection rates (in-year actual).
- Borrowing: 1) Total commercial investment income as % of total net general fund budget, 2) Total (£) commercial investments and (£ plus%) amount funded from borrowing, 3) Borrowing related to commercial investments as % of General Fund total borrowing, 4) Capital interest costs and MRP as a proportion of NRB.
- Performance against Budget Timetable.
- Frequency / timeliness of engagement with SMT/Cabinet.
- Proportion of Savings Proposals in Realised or at Delivering stage.
- Section 151 Officer Statement in respect of capital strategy, adequacy of reserves and other statutory commentary.
- Consider usefulness of benchmarking data re: financial resilience produced by External Audit Bodies - e.g. Audit Wales

# Fraud, Bribery & Corruption

**Description**

Fraud, financial impropriety or improper business practices increase as internal controls are weakened as resources become severely stretched.



**Risk Owner(s)**

Chris Lee  
(Ian Allwood)

Councillor  
Chris Weaver  
Finance, Modernisation and Performance

**What we've done/are currently doing to achieve the Residual Risk Rating**

- The Council communicates a zero-tolerance approach to fraud, bribery and corruption.
- Regular review of relevant policies and procedures e.g. the Fraud, Bribery and Corruption Policy, Anti-Money Laundering Policy and Disciplinary Policy.
- Financial Procedure Rules and Contract Standing Orders and Procurement Rules and training.
- National Fraud Initiative data matching exercises in collaboration with the Cabinet Office and Audit Wales.
- Receipt and dissemination of fraud intelligence alerts from law enforcement agencies.
- Regular counter-fraud updates to the Section 151 Officer, Governance and Audit Committee, Portfolio Cabinet Member and the Chief Executive.
- Governance and Audit Committee review of the risk management, internal control and corporate governance arrangements of the authority.
- Independent assurance from Internal and External Audit on the effectiveness of governance, risk and control.
- Mandatory disciplinary e-learning module for all managers to complete and a programme of mandatory e-learning modules and training for Disciplinary Hearing Chairs, Investigating Officers and Presenting Officers.
- Fraud Publicity Strategy, to publicise the Council's approach to counter fraud work / sanction activity and explain the roles and responsibilities of key parties.
- Counter-Fraud and Corruption Strategy, with associated Fraud Awareness eLearning and face-to-face training rolled out.
- Annual participation in International Fraud Awareness week.
- Investigation Team provision of investigation and counter-fraud advice, guidance and support.
- SMT annual participation in CIPFA fraud tracker assessment and response.
- Revised 'Anti-Money Laundering Policy' approved by Cabinet in Q3 2020/21 and eLearning rolled out to officers with key roles and those working in high-risk areas.
- 'Authorisation and Protocol Requirements for Review of Work Activities' approved by Cabinet in Q4 2020/21.
- Monitoring and reporting completion rates of mandatory fraud awareness training and anti-money laundering training.

**What we plan to do to meet target**

- Counter-Fraud and Corruption Strategy refresh during **2022/23**, with revised counter-fraud action plan to reinforce and drive the strategic intentions set, supported by awareness and training.
- Financial Procedure Rules to be reviewed (including the schools equivalent) and updated during **2022/23**, with awareness and training arranged. **ONGOING**
- Review ongoing of the suite of Counter-Fraud Operational Policies alongside the review of the Council's Disciplinary Policy **ONGOING**
- Training and awareness being rolled out on an Internet Investigation Procedure. **ONGOING**

**Potential Impact(s)**

- Increase in frauds and losses to the Council
- Reputational risk as more frauds are reported
- Increased time investigating suspected fraud cases impacting on capacity

**Key Indicators / Measures used to monitor the risk**

- Progress in both (1) Counter-Fraud and Corruption and (2) Financial Procedure Rules review and update (including development of associated training and awareness materials / modules / campaigns)
- Mandatory Fraud Awareness eLearning completion and face-to-face attendance rates
- Anti-Money Laundering eLearning completion rates
- Delivery of Fraud Awareness week campaign annually
- Delivery of Policy updates in accordance with associated targets
- Delivery of mandatory investigating officer training and the note taker training
- Timely completion of casework and investigations
- Provision of timely investigation and counter-fraud advice, guidance and support to Directorates
- Adherence to the NFI Security Policy and annual completion of compliance forms

**Type(s) of Impact**

- Service Delivery
  - Reputational
  - Legal
  - Financial
- Stakeholder

**Linked Risks**

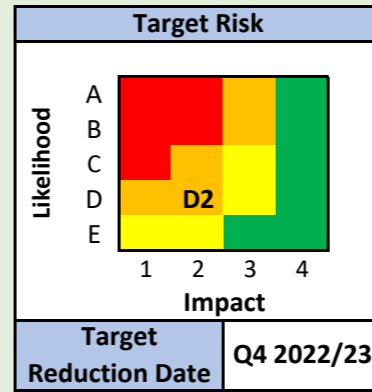
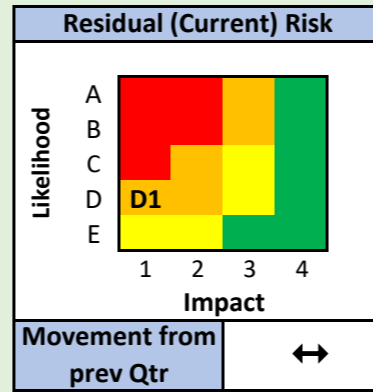
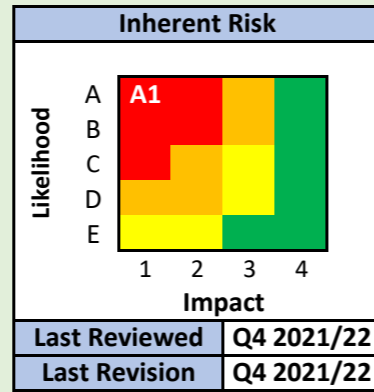
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# Information Governance

**Description**

Information handled inappropriately leaves the Council exposed to intervention and financial penalties issued by the Information Commissioner (ICO). This includes information held by Cardiff Schools.



**Risk Owner(s)**

Chris Lee  
(Dean Thomas)

Councillor  
Chris Weaver  
Finance, Modernisation and Performance

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Gold level assurance has been achieved through the annual Cyber Security Plus ISAME Accreditation in September 2021, the next annual accreditation of this process will take place in September 2022.
- A quarterly Information Governance Report and briefings of decisions or recommendations are provided on a quarterly basis to the Information Governance & Security Board, along with any concerns and risks from IG risk registers.
- A corporate Information Asset Register is held which details personal data assets held by each Council directorate. The next review scheduled for August 2022.
- Service Level Agreements in place for Schools Information Governance Support (All Cardiff Schools) and where Cardiff Council is the Data Controller for regional services, including Rent Smart Wales, National Adoption Service and Cardiff Capital City Deal.
- Corporate Retention schedule is in place and updated annually in line with any legislative changes or in line with any requests from services to update.
- Information Governance Maturity Model established to monitor risks against areas of information governance to feed into corporate risk status.
- The Digitisation of Paper Records Strategy and associated business process changes are in place with alternative delivery contracts in place to support increased paper storage demands, with processes established to support corporate programmes.
- Data Protection e-learning training available for Council staff to complete. Managers are able to monitor compliance with information provided as part of the Information Governance Board Report.
- National and Regional Information Governance Agreements in place in respect of covid-19 data processes
- An Information Governance Champions Group has been established.
- The Data Protection Officer has established a Data Protection Impact Assessment Panel to ensure that all changes to data processing activities are considered and any risks documented and escalated where necessary.
- Corporate escalation processes have been agreed to improve directorates failure demand with answering and providing information in respect of FOI requests.
- Support is being provided to Legal Services and HR with ensuring that an appropriate agreement is put in place to manage data protection risks associated with employee information data transfers and handling with TCS.
  - Continue working with Childrens Services to finalise the new service delivery model for management of social services requests to improve compliance, accountability and processes.
- Continue to review data breach claim processes and reports and determine support models for future claim handling.
- Released training and education communications to support schools with their Information Governance responsibilities.

**What we plan to do to meet target**

- Work is underway to review and update the Council's Record of Processing Activity (RoPA). Directorate Management Teams have been asked to prioritise this review for their respective directorates supported by Information Governance. **Q1 2022/23**
- Take forward, with support of an external supplier, options for alternative service delivery models for the Council's Records Centre linked to the Recovery and Renewal Programme. **Q2 2022/23**
- Develop an online Publication Scheme taking onward recommendations from the Information Governance & Security Board. **Q2 2022/23**
- Support ICT with gathering information on non personal data systems and a review of security and protection linked with Cloud Impact Assessment processes **Q1 2022/23**
- The Council has limited assurance of CCTV against compliance with the 12 principles of the Surveillance Camera Code of Practice - Options paper to be presented to ISB resulting in an action plan for improvements is being initiated to improve accountability and compliance with CCTV operations **Q2 2022/23**
- Embed processes through procurement and ICT for ensuring Data Protection Impact Assessments are completed if personal data is being processed to enable Information Governance & Security Board to have oversight of DPIA's completed against Procurement Contract Awards where personal data is processed **Q4 2022/23**

**Potential Impact(s)**

Leads to the Information Commissioner issuing notices of non-compliance

These could consist of:

- A "Stop Now" Order which would mean that no personal data could be processed by the Council in its entirety
- An Information Notice which would mean that a service would have to provide information in a very limited period thereby impacting on service delivery
- A Decision Notice could be issued as a result of non compliance with an FOI/EIR request which would require information disclosure
- Undertaking which requires an Action Plan of Remedial Measures which would be subject to ICO Audit
- Enforcement Notice requires immediate improvement action to be put in place
- Financial Penalty up to £17.5 million for Higher Level Tier and £8 million for Lower Level Tier breaches of the Data Protection Act.
- Compensation unlimited liability claims for damages as a result of a data breach from individuals.

**Type(s) of Impact**

- Service Delivery
- Reputational
- Legal
- Financial

• Stakeholder

**Linked Risks**

**Key Indicators / Measures used to monitor the risk**

- Suite of IG Indicators/Service Metrics
- No. of ICO complaints
- No. of FOI /EIR SAR Requests
- No. of individuals trained on Data Protection
- No of Data Protection Impact Assessments being undertaken
- No of data protection breach complaints/claims

# Cyber Security

## Description

There are 10 areas of potential risk within the National Cyber Security Centre cyber risk model.

Five of the 10 areas have been identified as high risk as follows:

Architecture and Configuration - The need to ensure that good cyber security is baked into systems and services and can be maintained and updated to adapt effectively to emerging threats and risks.

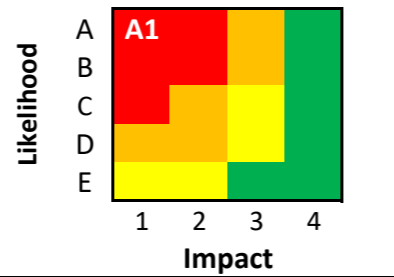
Vulnerability Management - The majority of cyber security incidents are the result of attackers exploiting publicly disclosed vulnerabilities to gain access to systems and networks.

Data Security - With the increasingly tailored ransomware attacks preventing organisations from accessing their systems and data stored on them, security measures should include maintaining up-to-date, isolated, offline backup copies of all important data.

Logging and Monitoring - the volumes of systems, applications and audit logs do not lend themselves to easily assess how and when systems are being used, leading to an ineffective response to deliberate attacks or accidental user activity

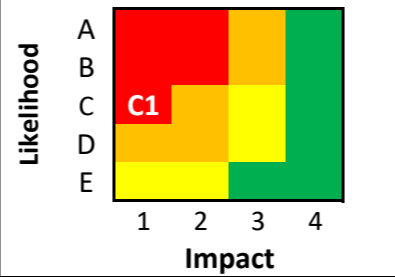
Supply Chain Security - 2018 Internal Audit identified contract, SLA and service management weaknesses in externally hosted services

## Inherent Risk



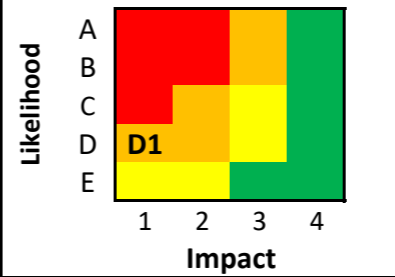
Last Reviewed	Q4 2021/22
Last Revision	Q4 2021/22

## Residual (Current) Risk



Movement from prev Qtr	↔
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## Target Risk



Target Reduction Date	Q1 2022/23
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## Risk Owner(s)

**Chris Lee**  
(Phil Bear)

**Councillor Chris Weaver**  
Finance, Modernisation and Performance

## What we've done/are currently doing to achieve the Residual Risk Rating

- The principal controls for the high risk areas are as follows:
- Architecture and Configuration - ICT Management reviewed Ransomware report and has implemented improvement action dates.
  - Data Security - security risk outputs for Cloud Impact Assessments and internal services are tested using WebInspect. TLS Email is used for protecting email in transit. Internal backup solution backs up all virtual and physical servers.
  - Logging and Monitoring - Log analysis is undertaken on a prioritised basis with incident reporting to ISB and discussed with IAO - risk of vulnerabilities could be further mitigated with additional resourcing for log monitoring - this is under continual review.
  - Supply Chain Security - Maturing PIA & CIA process used to assess risks to data and technology solutions

## What we plan to do to meet target

- SMT**
- To implement NCSC Board Toolkit review to increase overall Cyber Security posture. **ONGOING**
- Architecture and Configuration**
- Governance and management requirements to be formalised for periodic and systematic review of all ICT systems. **ONGOING**
  - To ensure strong ICT cloud security controls:
    - ICT lifecycle and notification targets are being monitored and managed through the 'ICT Platforms' risk actions. **ONGOING**
    - Collaboration between ICT and IG to develop and map current ICT system providers in phased development of an Information Asset Register. **ONGOING**
    - ICT and Information Governance (IG) Teams to liaise with FM for physical security assurances and to promote an incident reporting culture. **ONGOING**
- Vulnerability Management**
- Implement vulnerability management programme to bring services in-line with existing ICT internal patch policy. **ONGOING**
  - Meet patching obligations that exist within compliance frameworks and contractual obligations with vendors. **ONGOING**
- Supply Chain Security**
- SIRO to review / consider Cloud Infrastructure to ensure:
    - Assurance of effective governance and management.
    - Resource, risk appetite and outcomes required.
    - Education of business systems owners in risk and management of cloud based services.
    - Privacy Impact Assessment / Cloud Impact Assessments to be reviewed to ensure compliance with the requirements of the General Data Protection Regulation (GDPR) Action Plan being managed by the Information Governance Team. **ONGOING**

## Potential Impact(s)

The intent of cyber attackers includes, but is not limited to:

- financial fraud;
- information theft or misuse,
- activist causes to render computer systems intolerable and to disrupt critical infrastructure and vital services.

The impact of a cyber-attack / incident has the potential to involve the realisation of the risks associated with:

- An information governance breach (i.e. Stop Now Order, Information Notice, Enforcement Notice, Financial Penalty etc.)
- A business continuity incident – with a potential for major loss of service and legal, health and safety and financial implications.
- A financial / fraud related attack.

A malicious attack could result in loss of confidence from those transacting with the Council (reputation), as well as legal, asset, system, operational and financial implications.

## Type(s) of Impact

- |  |  |
|--|--|
| <ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul> | <ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Stakeholder</li> </ul> |
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## Linked Risks

Information Governance

## Key Indicators / Measures used to monitor the risk

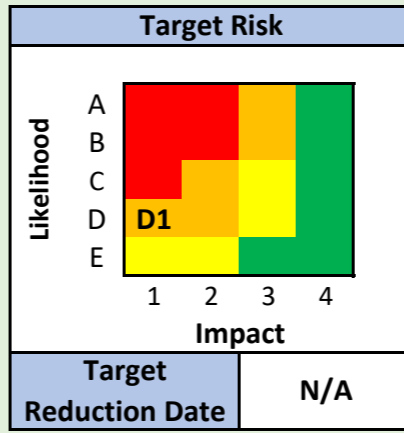
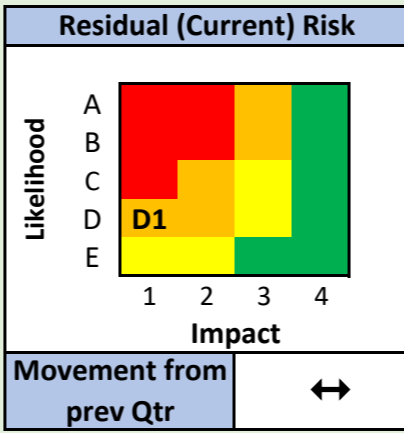
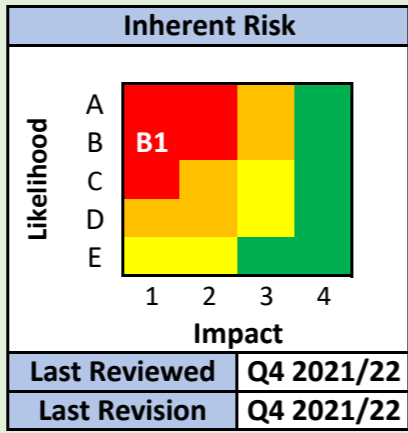
- Threat intelligence from National Cyber Security Centre (NCSC), including national posture and guidance via the National Cyber Security Strategy/Programme
- Threats and risks highlighted by NCSC Cyber Security Information Sharing Partnership (CiSP), Cymru WARP (Warning, Advice and Reporting Point) and Welsh Government/WLGA
- General UK posture and issues raised in national and local media
- Number of compromises - breaches are monitored, investigated and reported back via Information Security Board and where applicable the ICO
- Monthly reporting of number of virus attacks via email blocked

# Business Continuity

**Description**

Large scale incident/loss affecting the delivery of services.

The potential risk is that our most time sensitive activities are not sufficiently resilient and fail, following an incident which impacts on their delivery and that our incident management structure, used in response to internal incidents and external emergencies, also fails in response to an incident.



**Risk Owner(s)**

Chris Lee

Councillor Huw Thomas  
Leader

**What we've done/are currently doing to achieve the Residual Risk Rating**

- The Council has a BCM Champion who sponsors BCM at a strategic level
- We have an approved Business Continuity Policy which is aligned to ISO22301
- BCM toolkit is available on CIS or by contacting the Resilience Unit, as the organisation continues its transition to SharePoint.
- The Council employs a Business Continuity Officer who is a qualified ISO22301 lead auditor.
- The Council has a 24 hour Incident Management structure for Gold and Silver Officers.
- Cardiff Council is a member of the Core Cities Business Continuity Group
- Q4 of 2019/2020 saw the council undertake a full review and update of the activities delivered across the council allowing us to focus on the resilient delivery of key functions as we planned and responded to the COVID19 threat. This review was delivered at the Strategic Level.
- Each Directorate was tasked with reviewing and updating their key business continuity plans in preparation for the emerging COVID19 threat. Each Director/Corporate Director was responsible for ensuring this work was undertaken fully and properly. The existing Business Continuity work provided a solid foundation to our response to the COVID19 threat.
- The full corporate incident management team was activated in early March 2020.
- The Council worked positively at a Local Resilience Forum(LRF) level with partners supporting a wider Wales response to the COVID19 threat. This included daily reporting and escalation of key issues to the LRF.
- Areas were forced to change to a far more agile way of operating with our core ICT requirements changing to support far more agile/home working. The mode of delivery worked exceptionally well and provides the potential for longer-term resilient agile working in response to the ongoing COVID19 risk, in addition to positively supporting other aims and corporate risks.
- Staff across the council adapted at speed and have worked incredibly hard to deliver key services in new ways, in addition many staff changed roles to support the resilient delivery of key services and new asks on the council to keep the public safe.
- The Emergency Management Unit has developed an Incident Management Plan (Cardiff Council's Emergency Management Plan) to ensure alignment with ISO22301. This was fully reviewed and updated in 2021
- Internal Audit completed an audit of the Business Continuity Risk in Q4 of 2021/2022 and the assurance statement was "Effective with opportunity for improvement".
- The Resilience Unit supported directorates in looking at supply chain risks following the tragic war in Ukraine, this work will be on going as the risk horizon changes as a result of the conflict.

**What we plan to do to meet target**

- The full BC programme, which is focussed on our Red most time critical activities will recommence in **Q1 of 2022/23**.
- The BC Officer is working to develop and enhance individual Directorate response capability to ensure Directorates are in a stronger position to respond to incidents which could impact on the Council and our most time sensitive activities this will be reviewed again in **Q3 of 2022/23**.
- The BC officer is continuing a review of 4x4 resources across the council to support our response capability to deal with the potential of winter storms. The next updated review will be carried out in **Q3 of 2022/23**.
- The Business Continuity Officer will support eras in identifying key learning from the pandemic and ensure that key risks/lessons/processes that feed into the councils resilience capability are incorporated into our ongoing planning to support us in being ready for ongoing risks. This will, where appropriate, involve a review and update of individual BC plans by Directorates and also a review and update of the councils Emergency Management Plan. This work will be done as areas bring their planning up to date and should be complete by **Q3 of 2022/23**.

**Potential Impact(s)**

- **Health and Safety** – potential impact on staff and on the public relying on our most, time sensitive, critical services
- **Legal action** -Failure of key services could lead to Legal action against the council
- **Financial** - Failure of key services could led to significant financial cost both in terms of Ombudsman action and Enforcement action from regulatory bodies, as well as individual legal action against the corporate body where service failure leads to legal action against us from private claimants
- **Reputational** - Impact on key services to the public could lead to significant reputational damage to the organisation
- **Stakeholder** – Impact on key stakeholders as result of failure
- **Service delivery** – Potential significant impact on service delivery to the public, impact of key services could lead to significant impacts to the public and the corporate body un delivering its services

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>• Service Delivery</li> <li>• Reputational</li> <li>• Legal</li> <li>• Financial</li> </ul>	<ul style="list-style-type: none"> <li>• Health &amp; Safety</li> <li>• Stakeholder</li> </ul>
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**Linked Risks**

Brexit Risk

**Key Indicators / Measures used to monitor the risk**

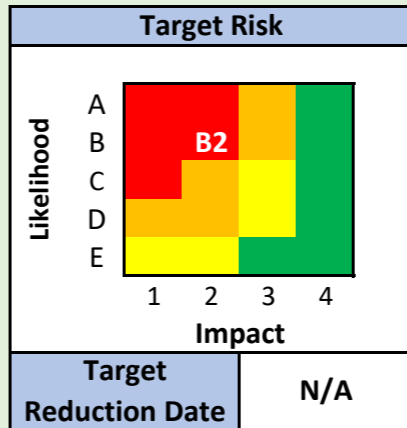
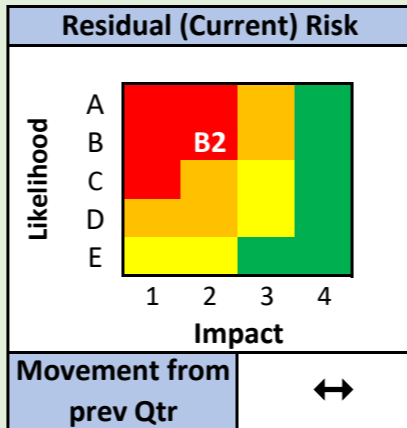
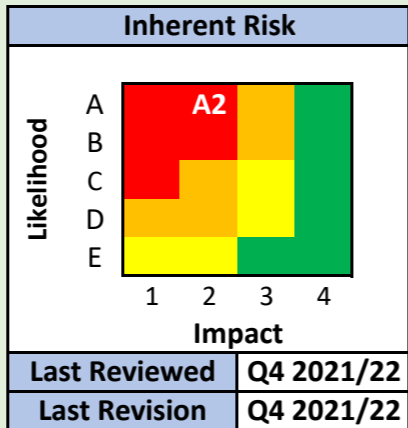
The Red activity BC plan status is reviewed via a report to SMT. Additionally the risk is managed as part of the Corporate Risk Management process via the CRR returns and the BC risk is also audited by Internal Audit . The last Internal Audit of the Business Continuity Risk was in in 2021/2022.

Tudalen 813

# Welfare Reform

**Description**

That the Council cannot meet its statutory obligations with the increased demands and reduced budgets placed upon it by the Welfare Reform including: Universal Credit, further reduction in Benefit Cap and size restrictions for social tenants. The potential impact of these changes on rent arrears, homelessness and child poverty make these changes a significant risk. In 2022 the DWP will commence the rollout of migration for claimants from legacy benefits to Universal Credit.



**Risk Owner(s)**

**Sarah McGill**  
(Jane Thomas)

**Councillor Lynda Thorne**  
Housing & Communities

**What we plan to do to meet target**

- Funding has been allocated to the Money Advice Team for 1 year to increase staffing, which will help with the negative impacts of both Welfare Reform and the pandemic on citizens. A request will be made to extend this by another year **Q4 2022/23**
- Work with WG to ensure that any new financial support schemes are designed in consultation with us. **ONGOING**
- Complete review into PRS. As part of our new LETS (Landlord Enquiries & Tenant Support Service) initiative we are contacting landlords to discuss the various options that we can offer, such as the Welsh Government Leasing Scheme and our own tenant matching scheme. The schemes offer a range of support services and benefits to the applicant and to the private landlord with the aim of making tenancies successful for both parties. **Q3 2022/23**
- Introduction of landlord portal so that HA's and in the future, private landlords can access information quickly about amount of and dates of payments due online **Q4 2022/23**
- Additional training will be provided when the migration of UC commences. **ONGOING**
- Increase in Homeless Prevention staff to work with clients at risk of homelessness at the earliest opportunity. Service can be provided from a partner building, community hub or in a client's home to increase engagement. **Q3 2022/23**

**Potential Impact(s)**

- Benefit claimants are priced out of the private rented sector market
- Private landlords stop renting to benefit claimants
- Private landlords leaving the rental housing market
- Social housing rents become unaffordable to some claimants, in particular those with large families
- Increased homelessness and demand for temporary accommodation – increased numbers seeking help with homelessness due to loss of private sector accommodation has already been seen. This is expected to increase further with the end of the evictions ban.
- Increased rough sleeping
- Increased rent arrears, increased evictions - The impact on Council tenant rent arrears has already been considerable and is having an impact?? on the HRA, this will continue to increase as more tenants move onto Universal Credit.
- Redeployment / Severance for housing benefits staff
- Changing demands on Council stock resulting in increased voids and/or undersupply of smaller properties
- Increased council rent arrears could impact on HRA and lead to barriers to building additional affordable housing
- LA less likely to pre-empt those who may be affected by changes and therefore unable to put mitigation steps in place This has already had a negative impact as the number of families affected by the Benefit cap who the advice teams have been able to initiate contact has reduced.
- Increase in poverty and child poverty, potentially an increase on demand on social services

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Communities staff continue to work closely with private sector landlords and advice agencies to mitigate wherever possible the reduction in benefit income to help prevent eviction. The Rent Arrears Pathway has been created using a one front door approach, supporting people to access the help they need to pay their rent or any arrears they have accrued.
- New schemes and incentives have been created to support both Landlords and tenants to obtain and retain accommodation in the PRS these include rent in advance and bonds, help with the cost of repairs and bespoke packages.
- Housing Options have undertaken a review of staffing levels due to increased demand on the service with prevention of homelessness its core objective. A range of support interventions are offered to tenants and landlords to reduce those needing to access homeless services.
- Increased partnership working to ensure that specific groups are encouraged to access help at the earliest opportunity. The service is being marketed to reach as many vulnerable clients as possible, working with Rent Smart Wales, Community Hubs, CAB and Cardiff Credit Union.
- Housing Solutions and Housing Help line has moved to the Advice service. This will ensure that those who are homeless or threatened with homelessness can access advice and support in their own community, or over the phone and be triaged into the right help. A successful initial pilot was carried out for Prevention Advice in Hubs, to test further expansion.
- Housing Options service are working with third sector partners to help clients move into settled accommodation in the private rented sector, primarily for single people with low support needs who have lived in supported accommodation.
- A streamlined process is in place for re-housing tenants who need to downsize as a result of the social housing size restrictions. DHP is being used to pay removal costs and to cover shortfall while tenants are waiting to move. Welfare Liaison team within the housing service is in place to assist tenants affected by the changes. Work has been carried out to identify those affected by the Benefit Cap and to advise them accordingly and to identify the most vulnerable families and award DHP.
- DHP process has been reviewed to ensure that all those who request a DHP are given budgeting, income maximisation and debt advice.
- Digital inclusion training and Universal Credit Support has been rolled out across all the Community Hubs, Adviceline and Housing Helpline.
- Further additional resource has been agreed for supporting council tenants following the implementation of Universal Credit Full Service as rent arrears have increased significantly, staff have been recruited to assist with this and the new team is working well. Rent arrears procedure has been reviewed to include a more preventative and flexible approach and more assistance for more vulnerable tenants.
- Regular meetings are held with social housing providers to monitor and improve processes.
- In depth assessments continue to be completed at point of presentation to include a financial statement which will allow discussion to be had around possible expenditure concerns.
- Expansion of the Private Rented Sector Housing Solutions Team to include a dedicated single point of contact for landlords, and dedicated phone line for landlords will mean contact is easier.
- Digital and budgeting support available from Into Work and Money Advice on a Saturday for the first time for those who are claiming UC and in work

**Type(s) of Impact**

**Linked Risks**

**Key Indicators / Measures used to monitor the risk**

Number of customers supported and assisted with their claims for Universal Credit  
Additional weekly benefit identified for clients of the city centre advise team

## Increase in Demand (Children's Services)

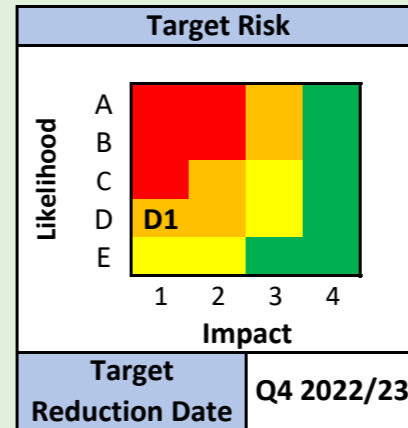
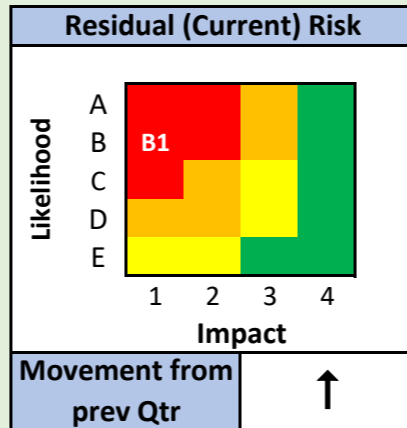
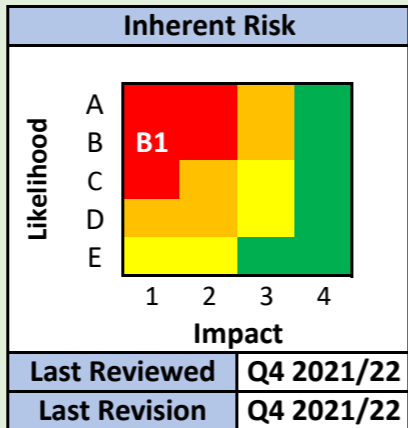
**Description**  
 Failure to effectively manage demand (and respond to increasing demand due to Covid-19), resulting in increase in number of children requiring services and financial pressures this presents.

**Potential Impact(s)**

- Family breakdown leading to children becoming looked after.
- Growth in the number of children entering the looked after system and associated costs for the Authority.
- Insufficient placements to meet need resulting in increase in numbers living outside Cardiff.
- Challenges in improving outcomes for children leading to children being less likely to achieve their potential and to be fully participating citizens.
- Delays in issuing care proceedings because of existing capacity in Children's Services and consequential impact on budgets if work needs to be outsourced.
- Challenges in effectively managing service and financial pressures.
- Impact of high caseloads on staff and potential increase in social worker turnover.
- Welsh Government programme of work to eliminate profit from the care sector and potential impact on destabilisation of placements.
- Increase in use of unregulated placements.

N.B. All demand risks carry safeguarding implications.

Type(s) of Impact	
<ul style="list-style-type: none"> <li>• Service Delivery</li> <li>• Reputational</li> <li>• Legal</li> <li>• Financial</li> </ul>	<ul style="list-style-type: none"> <li>• Community &amp; Environment</li> <li>• Stakeholder</li> </ul>



**Risk Owner(s)**

Sarah McGill (Deborah Driffield)	Councillor Graham Hinchey Children & Families
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**What we've done/are currently doing to achieve the Residual Risk Rating**

- Early Help - Cardiff Family Advice and Support Services for families who do not require statutory services
- Interventions Hub launched and now incorporates the Adolescent Resource Centre.
- Referrals to services such as Safe Families and Ymbarel made as required to provide families with required support
- Dedicated worker to focus on young carers in post.
- Increased in house residential provision, including emergency pop up / pop down provision.
- Option for families to use Direct Payments available (review being undertaken and will consider potential use for children other than children with disabilities).
- Shifting the balance of care and associated workstreams being progressed - Strength based working / Reunification Framework / Family Group Conferencing / Safe and Together model / Integrated Edge of Care Service for Young People - The Right Place - based on the North Yorkshire model.
- Children's Commissioning Strategy and Market Position Statement in place to address accommodation sufficiency issues and to manage the market
- Refreshed workforce strategy in place to improve recruitment and retention of permanent staff
- Work to enable prudent social work / skill mix ongoing - ensuring social workers do what only social workers can do and recruitment to support staff / multi disciplinary staff.
- 4th team implemented in each locality to increase management capacity.
- Working hours are flexible to meet service and personal needs.
- Provision and analysis of performance information is tailored to meet arising issues (e.g. monitoring domestic violence and development of PowerBi reports).
- Appropriate use of COVID-19 expenditure claims and Recovery Fund from Welsh Government and other funding streams; and financial planning around how longer term needs will be met.
- Temporary Resource Assistants recruited for OMs and social workers to test proof of concept.
- Vulnerability Change Project is reviewing the police mechanism for referrals to Children's Services - with the aim of reducing PPNs on low level cases.
- Resource Panel in place to oversee decisions regarding placements.
- Services being delivered under Amber level of business continuity model with focus on highest risk cases.
- Family Drug and Alcohol Court pilot ongoing to better support parents with drug and alcohol issues through the care proceedings process.
- 2 urgent projects launched to address demand and accommodation sufficiency issues - one to specifically focus on services for children with disabilities and another to consider the wider cohort of children being looked after.
- Established an Improving Placement Options Programme Board, meeting weekly to provide corporate support and oversight of specific project activity to respond to the significant increase in service demand and associated increase in expenditure

**What we plan to do to meet target**

- Business processes to be reviewed as part of implementation of Eclipse system **2022/23**.
- Work with judiciary re: planned changes to private and public law **Q4 2022/23**.
- Systems review undertaken with initial focus on the front door to ensure sustainability of services going forward - report pending and will be reviewed and actions to be taken / steps planned on receipt **Q1 2022/23**.
- Reviewing Hub being launched on locality by locality basis. **Q2 2022/23**
- Delivering Excellent Outcomes Children's Services Strategy to be reviewed. **Q3 2022/23**
- In house respite provision currently being reviewed to ensure it meets demand and need. **Q4 2022/23**

**Linked Risks**

- Workforce Planning (Social Services)
- Safeguarding

**Key Indicators / Measures used to monitor the risk**

- Children's Services:
- Early Help 1 - Number of people supported through the Family Gateway
- Early Help 2 - Number of people supported by the Family Help Team
- Early Help 3 - Number of people supported by the Family Support Team
- Contacts 1 - Number of Contacts / Referrals Received
- SSWB 24 - Percentage of assessments completed for children within statutory timescales
- CS LAC 3e - Number of children looked after

# Corporate Safeguarding

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)								
Systemic failure in the effectiveness of the Council's safeguarding arrangements together with other statutory safeguarding partners.				<table border="1" style="width: 100%;"> <tr> <td style="width: 50%; text-align: center;">Sarah McGill (Deborah Driffield)</td> <td style="width: 50%;"> <b>Councillor Huw Thomas</b> Leader  <b>Councillor Susan Elsmore</b> Social Care, Health &amp; Well-being  <b>Councillor Graham Hinchey</b> Children &amp; Families  <b>Councillor Chris Weaver</b> Finance, Modernisation and Performance                 </td> </tr> </table>	Sarah McGill (Deborah Driffield)	<b>Councillor Huw Thomas</b> Leader <b>Councillor Susan Elsmore</b> Social Care, Health & Well-being <b>Councillor Graham Hinchey</b> Children & Families <b>Councillor Chris Weaver</b> Finance, Modernisation and Performance						
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	<table border="1" style="width: 100%;"> <tr> <td>Last Reviewed</td> <td>Q4 2021/22</td> </tr> <tr> <td>Last Revision</td> <td>Q4 2021/22</td> </tr> </table>	Last Reviewed	Q4 2021/22	Last Revision	Q4 2021/22	<table border="1" style="width: 100%;"> <tr> <td>Movement from prev Qtr</td> <td style="text-align: center;">↔</td> </tr> </table>	Movement from prev Qtr	↔	<table border="1" style="width: 100%;"> <tr> <td>Target Reduction Date</td> <td>N/A</td> </tr> </table>	Target Reduction Date	N/A	
Last Reviewed	Q4 2021/22											
Last Revision	Q4 2021/22											
Movement from prev Qtr	↔											
Target Reduction Date	N/A											

Potential Impact(s)	What we've done/are currently doing to achieve the Residual Risk Rating	What we plan to do to meet target
<ul style="list-style-type: none"> <li>A child(ren) or adult(s) suffer(s) preventable abuse or neglect which may result in harm or death</li> <li>Reputation of Council and partners</li> <li>Severe adverse publicity</li> <li>Potential regulator intervention</li> <li>Loss of confidence by community in safety of children and adults</li> <li>Loss of confidence of staff in the overall "safety" of the service, impacting on morale, recruitment and retention</li> <li>Potential litigation with associated financial penalties</li> <li>Significant financial implications of formal intervention</li> </ul>	<p><b>Regional</b></p> <ul style="list-style-type: none"> <li>Regional Safeguarding Board oversee the safety and well-being of children and young people across the partnership.</li> </ul> <p><b>Corporate</b></p> <ul style="list-style-type: none"> <li>Corporate Safeguarding Board strengthened with development of Steering Group and appointment of Directorate Lead Officers</li> <li>Improved data capture and reporting on training compliance allowing targeted action by managers.</li> <li>New self-assessment form and process introduced, with identified improvement actions built into Directorate Delivery Plan.</li> <li>Initial Analysis of referral data completed, with further work underway to enable a more granular breakdown.</li> <li>Recruitment and Selection Policy updated, including additional information on safeguarding</li> <li>Recommendations of Audit Wales review actioned.</li> <li>Appropriate safeguarding arrangements in place for staffing local government elections.</li> <li>Education provision secured for high risk children throughout the COVID-19 crisis.</li> </ul> <p><b>Contextual Safeguarding</b></p> <ul style="list-style-type: none"> <li>Exploitation Strategy - led corporately with community safety approach.</li> </ul> <p><b>Children's Services (Summary Position)</b></p> <ul style="list-style-type: none"> <li>In terms of business continuity, our operational approach to child protection remains unchanged. Child protection procedures continue to take precedence and children at the highest risk will be prioritised. Operating model is review regularly.</li> <li>Systems in place to learn lessons from Child Practice Reviews, Adult Practice Reviews and multi agency practitioner forums.</li> <li>Quality Assurance Framework in place; learning workshops introduced to complete feedback loop.</li> <li>Wales Safeguarding Procedures in place - training held and systems updated. Safeguarding Adolescents From Exploitation approach being piloted in North locality.</li> <li>High Risk Panel facilitates robust and timely multi-agency decision making at senior management level for our highest risk young people.</li> <li>OMs have oversight of all high risk cases and share decision making responsibility.</li> <li>Practice development group set up with leads allocated to workstreams to shape good practice.</li> <li>Children's Services and Education working closely, including in the development of locality working.</li> <li>Close partnership working (via Regional Partnership Board and Starting Well Programme) in response to the emerging crisis regarding young people with serious mental health and emotional wellbeing issues is ongoing (i.e. increase in eating disorders, self harm, and attempted and actual suicide).</li> <li>Close partnership working in relation to serious youth violence, including with Violence Prevention Unit and Community Safety is ongoing.</li> <li>Close partnership working in response to complex safeguarding concerns with providers, with particular emphasis on emerging issues with providers of accommodation and support for children with additional and complex needs is ongoing.</li> <li>Revised Supervision process launched following feedback from pilot.</li> <li>Child Sexual Abuse practice leads training programme with Centre of Excellence in place.</li> <li>Review of escalating concerns process underway to strengthen arrangements and interface with safeguarding procedures and large scale enquiries.</li> <li>Practice leads appointed in locality teams to support newly qualified staff and improve quality and consistency of practice.</li> </ul> <p><b>Adult Safeguarding (Summary Position)</b></p> <ul style="list-style-type: none"> <li>Development of an improved quality assurance process for care homes that includes monitoring visits undertaken by social workers in addition to Contracts staff and the commitment to undertake urgent (same day) on-site monitoring when serious concerns are raised.</li> <li>Advice / guidance on care homes being produced for family members to inform choice, expectations and conversations on care concerns.</li> <li>Contributing and supporting the regional review of MARACs (domestic abuse MARAC, SWOT MARAC and Human Trafficking MARAC).</li> <li>Development of arrangements to support people who hoard and self-neglect and develop sustainable and holistic approaches to achieving outcomes.</li> <li>Strengthening of working relationships between Adult Safeguarding, Social Work, Health, Independent Living Services through regular contact.</li> <li>Practice guidance has been developed and circulated to provide a benchmark of practice expectations.</li> </ul>	<p><b>Corporate</b></p> <ul style="list-style-type: none"> <li>Targeted training work in front facing services with low take up <b>Q3 2022/23</b></li> <li>Review Safeguarding Policy following publication of best practice by Welsh Government <b>Q3 2022/23</b></li> <li>Data development work on cross council referrals <b>Q3 2022/23</b></li> <li>Output of self-assessments to be quality assured, included and tracked through Directorate Delivery Plans. <b>Q2 2022/23</b></li> </ul> <p><b>Children's Services</b></p> <ul style="list-style-type: none"> <li>Strengthen arrangements for responding to professional concerns. <b>Q4 2022/23</b></li> <li>Strengthen contractual arrangements in relation to safeguarding. <b>Q4 2022/23</b></li> <li>MISPER Strategy under development. <b>Q4 2022/23</b></li> </ul> <p><b>Adult Services</b></p> <ul style="list-style-type: none"> <li>Develop whole home large scale enquiry process <b>Q4 2022/23</b></li> <li>Launch young person's MDT in partnership with Children's services and Housing to address the needs of young people with complex transitional arrangements, behavioural difficulties or known risks <b>Q2 2022/23</b></li> <li>Partnership development activity between learning disabilities team, third sector services and adult safeguarding to better address incidents of SU on SU abuse in supported living services settings <b>Q3 2022/23</b></li> </ul>

Type(s) of Impact	Linked Risks	Key Indicators / Measures used to monitor the risk
<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> <li>Partnership</li> <li>Community &amp; Environment</li> <li>Stakeholder</li> </ul>	<ul style="list-style-type: none"> <li>Increase in Demand (Children's Services)</li> <li>Workforce - Social Services</li> </ul>	<ul style="list-style-type: none"> <li>SCC.014 Percentage of initial child protection conferences carried out within statutory timescales during the year</li> <li>SCC.034 Percentage of child protection reviews carried out within statutory timescales during the year</li> <li>SSWB 27 Percentage of re-registrations of children on local authority Child Protection Registers</li> <li>SSWB 28 Average length of time for all children who were on the CPR during the year</li> <li>Res 15 - Percentage of Council staff completing Safeguarding Awareness Training</li> </ul>

Tudalen 816

# Legal Compliance

**Description**

Changes in services and staff roles across the Council resulting in:

- gaps in Council wide knowledge of the local authority framework of responsibilities and duties within which we have to operate;
- inability to deliver the services in accordance with all duties and responsibilities due to lack of resource:

In each case leading to increased risk of challenges.

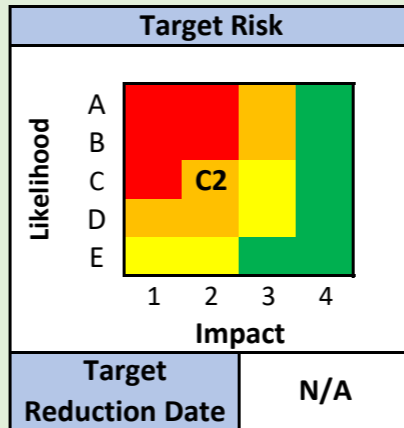
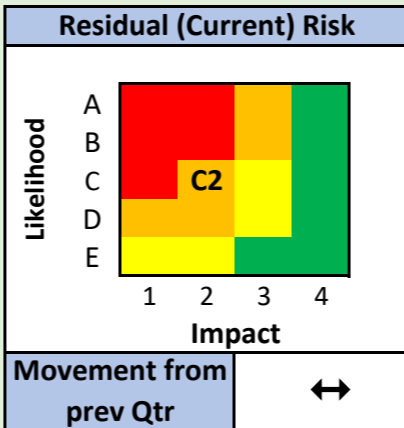
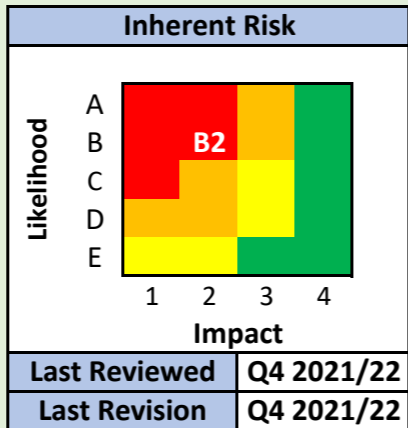
Reduction and changes in front-line services, discretionary and statutory, will lead to increased risks of challenge from users and other stakeholders affected.

**Potential Impact(s)**

- Increase in number of challenges and complaints with consequences in terms of already stretched resources and impact of adverse decisions
- Implementation of decisions delayed due to challenges and potentially fatally disrupted
- Impact on projects if reputation for sound management and implementation of projects is damaged
- Major incident
- Adverse press/media reaction
- Involvement from Welsh Government in terms of performance standards or measures
- Increased costs
- Impact on capacity to deal with proactive legal work

**Type(s) of Impact**

- Service Delivery
- Reputational
- Legal
- Financial



**Risk Owner(s)**

Davina Fiore

Councillor Huw Thomas  
Leader

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Professional internal legal and financial advice provided to a high standard.
- Maintaining robust decision-making process by providing legal implications on all Council, Cabinet and Committee reports and Officer Decision Reports at Director level
- Appropriate use of NPS Legal Services by Solicitors Framework to increase resilience where it is necessary to outsource legal work
- Dedicated Corporate teams in specialist areas e.g., equalities, FOI / DPA
- Sharing training/publications received internally to the legal department and when necessary to client departments
- Encourage Directorates to ensure Committee and Cabinet reports are discussed at preliminary stage in development to ensure all legal issues are addressed early through client department relationships
- Decision Making Training to both the Senior Management Forum and the Managers Forum carried out in 2020 and Pre-Election Period and Decision-making Pre and Post the Local Election briefings given to the Senior Managers Forum and the Cardiff Managers Forum in January 2022
- Decision Making training session held for the Environment Directorate managers in Jan 2022

**What we plan to do to meet target**

- Where identified, provide guidance based on standard precedents for use in cases of low value/low risk/repetitive matters to minimise the gaps in Council wide knowledge **ONGOING**
- Provide, if requested, ad-hoc legal training to Directorates to develop knowledge within Directorates of specific statutory functions. **ONGOING**

**Linked Risks**

**Key Indicators / Measures used to monitor the risk**

Number of Judicial Reviews and Number of Successful Challenges

Mae'r dudalen hon yn wag yn fwiadol



**CABINET MEETING: 28 SEPTEMBER 2022**

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**ANNUAL PROPERTY PLAN 2022/23****INVESTMENT & DEVELOPMENT (CLLR RUSSELL GOODWAY)****AGENDA ITEM: 9**

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**Reason for this Report**

1. To approve the 2022/23 Annual Property Plan (APP).

**Background**

2. The Council's land and property estate is considerable, with property running costs representing the second largest call on the Council's budget after staff costs. Changes to the way in which the Council delivers its services is inextricably linked to the management of its operational property estate and therefore strategic estate management offers an on-going opportunity to support improved efficiency and service delivery. This is particularly relevant in the post COVID recovery period as services adapt to working in new ways and different environments, for example the adoption of Hybrid Working models.
3. Land and property management is a key strategic activity which aligns the Council's service and financial objectives with the property estate. It ensures optimisation of property assets to best support the organisation's business goals and objectives. The requirement for effective land and property management is based on treating property as a corporate resource which forms the basis of the County Estates team and Corporate Landlord principles.
4. In December 2021, Cardiff Council adopted a new five year Corporate Property Strategy (2021-2026) setting out a framework within which all Council property related matters are to be managed. The Cabinet approved Strategy, entitled "*Leaner and Greener*", established a series of targets over the five year period designed to support core corporate objectives relating to service delivery, regeneration and the Council's budget.
3. The Annual Property Plan (APP) is an annual report which serves as the implementation plan for the Strategy. The targets within the APP contribute towards the five year targets set out in the Property Strategy, reporting the transactions completed from the previous financial year, as well as the transactions planned for the current financial year. The APP

also provides updates on any relevant property projects or initiatives and their relevance to the Property Strategy.

5. An Annual Property Plan will be published for each year of the five year Corporate Property Strategy. Financial year 2021/22 was the first APP in the new strategy and APP 2022/23 is the second.

### **Issues**

6. The Corporate Property Strategy 2021-26 set out the strategic intent for key elements of the property estate. These areas cover a large work programme and are subject to specific governance. They impact performance of the estate at a strategic level with notable updates including:

#### Hybrid Working

7. Development of the Council's accommodation strategy in relation to Hybrid Working is at an advanced stage. This is an important workstream in the context of the Council's operational estate, particularly in regards to Core Office, as the outcome will have a significant impact on the Council's future office requirements.
8. Finalisation of the Hybrid Working model will be a key consideration in the retain / remodel / relinquish decision making process within the operational estate. This in turn has a linked dependency with the modernisation and carbon reduction initiatives as the Council seeks to make the best value investments that maximise the objectives in those specific areas. For example, it will be key to invest in properties and spaces that the Council intends to retain over the long term and are aligned to service requirements.

#### Regeneration

9. Utilisation of the Council's land and property assets is fundamental to the delivery of large-scale regeneration schemes aligned with the Council's Economic Development and Wellbeing initiatives. Examples include the International Sports Village and the Atlantic Wharf masterplan. These schemes are of a scale that requires specific governance and individual cabinet reports. The related land and property transactions are reported through the Annual Property Plan. Given the community impact of major regeneration schemes it is important to ensure appropriate consideration is given to equality impact and future generations.
10. The remaining vaccination centres at Bayside and Splott are due to close this financial year and the sites will return to Council management. The former STAR Centre will be subject to a housing redevelopment scheme, and the former Toys R Us building will be brought forward as part of the International Sports Village regeneration.

## Housing

11. The Council's Housing targets remain a corporate priority. The Property Strategy established the principle that any Council owned sites declared surplus to requirements should be firstly assessed for suitability to meet housing objectives. This is a key element of the decision-making process when disposing of surplus land assets.
12. The appropriation of general fund sites to the Housing Revenue Account (HRA) has made up a significant proportion of the annual capital receipt target over the course of the last 6 years. As new housing programmes are developed it is anticipated further appropriations will be required to ensure an adequate supply of suitable sites. These will be reported through the Annual Property Plan and specific HRA governance.

## SOP

13. Implementation of the Sustainable Communities for Learning Band B Programme is ongoing. The replacement Fitzalan High School on Leckwith Road is at an advanced stage of construction and the St Mellons CiW Primary is also progressing well on site. A number of other projects are progressing through the design phase, including the Fairwater Campus and the new Willows High School. The programme has successfully developed Net Zero Carbon (NZC) standards for new build schools and improved procurement processes. Welsh Government has supported strategic land transactions to enable the implementation of the programme, such as the acquisition of the former HMRC site at Ty Glas, Llanishen. Risks remain in relation to increasing inflation in the construction sector and changing demographics.
14. A strategic plan will be brought forward in due course to establish principles for decision making and priorities. An annual programme update report will also be brought forward in the Autumn 2022. There is limited land available within the Council's estate so there may be further acquisitions and disposals to support future projects. Any transactions would be reported through Cabinet and the outlined in the Annual Property Plan.

## Corporate Estate

15. In addition to the impact of Hybrid Working on core office noted above, the Council's operational estate is under constant review to ensure alignment with changing service needs. Statutory services such as Social Services continue to evolve delivery models post COVID that may see property requirements change. Other areas of the estate under review include the Council's operational depots and the full range of sports & leisure facilities. It is important to consider service needs together with the Council's Financial, Hybrid Working, Carbon Reduction and Modernisation programmes to enable good property decisions over the short, medium and long-term.

## Land

16. The Council estate includes considerable land assets principally used either operationally for purposes such as education, recreation and public open space or is held of planning purposes to deliver future development and regeneration. Where land becomes surplus to service requirements it is assessed to determine most appropriate future use. This includes alternative operational use by other service areas to deliver different services i.e. a change of use. However in some instances the land is declared surplus to Council requirements and can be considered for disposal.
17. The delivery of various Council objectives is dependent on the availability of land. Examples include established regeneration programmes such as Housing and SOP. More recently One Planet Cardiff and the Council's objectives relating to sustainability and carbon reduction have introduced land dependent projects including Coed Caerdydd and community food growing. Finally, the Council has a capital receipts target to support the capital programme. Consideration will be given to the delivery of each requirement and any recommendations will be made on a case-by-case basis.

### **APP targets 2022/23**

18. The Corporate Property Strategy 2021-26 identified five performance targets to be achieved by the end of the strategy. Each year the APP determines targets to be achieved annually that then contribute to the strategy target. The 2022/23 targets are as below:

	Carbon reduction	Priority 1 works commissioned	Running Cost reduction	General Fund Capital Receipts	Investment estate target
Target	<b>Maintain current position</b>	<b>100%</b>	<b>£100k</b>	<b>£5.5m</b>	<b>n/a (5 year target)</b>

**Table 1. Annual Property Plan targets 2022/23**

## One Planet Cardiff – Carbon Neutral Built Environment

19. The One Planet Cardiff strategy seeks to achieve a carbon neutral Cardiff Council by 2030. The built environment is one of the key components to the total carbon footprint of the Council. The built environment is comprised principally of the corporate and education estates. The Property Strategy 2021-26 set a target of reducing the carbon footprint by 30% in the Built Environment by 2026.
20. The table below shows the carbon footprint of the Cardiff Council built environment over the last three years. 2019/20 was unaffected by COVID and serves as an effective benchmark year. The trend shows a considerable reduction in the carbon footprint in 2020/21. This was largely due to the Council closing operational buildings as part of the COVID

response. 2021/22 saw an increase from the previous year, but not back to 2019/20 levels. The increase in carbon footprint in the built environment in 2021/22 was largely due to the easing of COVID restrictions and the reopening of Council operational properties.

	2019/20	2020/21	2021/22
Built Environment Carbon Footprint tCO <sub>2</sub> e	19,000	15,000	16,300

**Table 2. Carbon footprint in the Built Environment 2019/20 to 2021/22**

21. The APP carbon reduction target for 2022/23 is to maintain the carbon footprint at its current level and minimize any rise back to previous levels.
22. The Property Strategy sets out the key areas of focus to permanently reduce the built environment carbon footprint including modernisation of the estate through refit, behavior change, more efficient use of our properties, passive decarbonization of the grid and rationalisation of property. These schemes are ongoing and will take time to mature and make a notable change to the annual carbon footprint. Significant decreases may not be seen until later years of the Property Strategy and the One Planet Cardiff Strategy.
23. The Council has invested in new pilot benchmarking tools in both the corporate and education estates. These tools provide up-to-date and accurate utility usage allowing for a more accurate carbon output calculation. Further budget has been secured through the One Planet Cardiff carbon reduction programme to install further benchmarking tools within the corporate estate. Installation is planned over the next two years. It is important that the Council is able to report the carbon footprint consistently year on year over the course of the One Planet Cardiff strategy.
24. Preliminary work is underway to develop Refit 4. Nineteen school sites have benefited from previous Refit programmes delivering an average of 13% carbon reduction. Refit 4 will once again include schools but will also be extended to the corporate estate. Due to the scale of works required to meet One Planet Cardiff carbon reduction targets, Refit 4 will be the largest programme thus far. The detail of the programme is currently being developed and will be subject to a separate cabinet report.
25. In regards to carbon offsetting, in its first planting season (21/22) Coed Caerdydd enhanced the city's traditional tree planting activities to achieve an extra 8 ha of new woodland areas across the city (20,000 individual trees in total). This represents an increase of over 350% of the traditional planting activity.
26. The overall target for One Planet Cardiff is to increase canopy cover across the city from 18.9% to 25% by 2030 which requires 839 Ha of land. As noted above, there is a range of competing demands for land to deliver other Council objectives. The Authority currently does not have sufficient

land in its portfolio to meet the quantities needed. It is likely private land holdings will need to be utilised where possible and opportunities arise.

### Modernisation

27. Modernisation of the estate describes the planned investment, repair and improvement of the councils corporate and education properties. The Property Strategy sets a target of ensuring all priority 1 works identified (through surveys, suitability assessments and statutory maintenance) are commissioned on an annual basis. This was achieved in 2021/22 with £21.8m works commissioned in total, £2.3m in the corporate estate and £18.5m in education.
28. The programme in 2022/23 is likely to be more extensive, with a provisional total works value of £54m, split £3.2m corporate and £51m education. This programme is draft and subject to affordability and contractor availability. A key piece of ongoing work relates to the alignment of planned capital works (asset renewal) with the carbon reduction refit proposals. It is important that going forward these work streams are planned together and complement each other to ensure maximum value for money and impact within the retained estate.
29. The education estate has seen an increase in spend from circa £13.1m in 2020/21 to £18.5m in 2021/22. Despite the increase spend, significant risks and challenges still remain due to the age of the estate. Despite the increase in planned works, there are still regular non-planned works some of which are significant. Examples include Stacey Primary School major refurbishment; Tremorfa Nursery structural works; Gwaelod Y Garth demountables; various stonework issues and underground water leaks. Due to the peak of secondary mainstream places and increasing ALN demands, the programme is also bringing forward a number of larger schemes to accommodate the sufficiency demands. Further work is underway to assess the condition of the education estate and to set the annual asset programme of work.
30. For reasons of materiality and consistency with other capital controls, a de minimis level of expenditure is applied below which capital spend is treated as revenue. This de minimis level is set at a £6,000 and is applied at a scheme/project level rather than on an invoice-by-invoice basis.
31. In the absence of a budget for undertaking asset renewal work of value less than £6,000 because the revenue budget is small in value, such works are being undertaken in a reactive way and may not be addressed until the works situation approaches a critical state. County estates will work with finance colleagues to consider appropriate budget options for the undertaking of proactive asset renewal works below the capital de minimis level of £6,000 in future years.
32. In July 2022 Cabinet approved the procurement of the third generation building framework. Authority was delegated to the Director of Economic Development to complete the procurement. The new framework is scheduled to take effect from 1/4/23.

### Running Cost reduction through relinquishment

33. The property strategy identifies a £6m reduction target over the course of the strategy. The principle means of achieving savings is through rationalisation of the Council's operational footprint. The implementation of hybrid working, and reviews of the operation estate are anticipated to deliver larger running cost savings in later years of the strategy. In 2021/22, a reduction of £260k was achieved. £100k is the target for 22/23.
34. The cost of energy has risen significantly over the last 18 to 24 months. Cardiff Council is part of a UK wide consortium via CCS (Crown Commercial Services) which includes all other public sector bodies. The CCS purchase our power and gas on the market over a set period of time. As part of this we have large economies of scale to support us with getting the very best prices on the market and to negate as much risk as possible. As such we have been protected from the widely publicised energy spikes with the increases not filtering through until April 2023.
35. Both the CCS and Cardiff Council's in-house Energy Team continue to monitor the utility markets and work closely with finance to set budgets. The prevailing sentiment is that the next financial year will be the highest in terms of cost and although it will not go back down to historic levels (pre-COVID) it is anticipated the market will soften slightly from 2024. The market is expected to remain high until at least 2030.

### Capital Receipts

36. Capital Receipts from the disposal or appropriation of general fund land and property is critical to support the Council's capital programme. The Corporate Property Strategy targets achieving £25m Capital Receipts by 2025/26. £2.1m general fund receipts were achieved in 2021/22. The target for 2022/23 is £5.5m with £2.5m achieved as of Q3.
37. The former Glan Morfa school site will be appropriated to the HRA in 2022/23, implementing a meanwhile community use prior to redevelopment in future years.
38. As part of this Cabinet Report and per the APP list, specific approval is being sought for delegated authority to complete the disposal, via appropriation of by the HRA, of land at the former Llanedeyrn Family Centre and St Teilo's School. The land has been rendered surplus via the School Organisational Planning programme. The capital receipt captured will include provision for ring fenced sums for new school pitches and other relevant community proposals.

### Investment Estate

39. The Property strategy identifies a £600k net increase in rental income by 2025/26. This is not tracked in the APP on an annual basis due to the nature of the transactions in the portfolio. However, it is managed through established governance involving Estates and Finance officers.

40. The Council's Investment Estate will continue to be managed with a commercial approach, completing outstanding lease events and where opportunities arise, seek to re-gear leases and potentially re-let at higher commercial market rents. Currently, there are 17 rent reviews to implement across the Investment portfolio in FY 22/23, and 11 in FY 23/24. These comprise a mix of stepped rents, RPI rents, and open market reviews.
41. Where a decision is taken to dispose of an investment asset, this may have a short term adverse impact on income receivable, until the disposal proceeds are re-invested. In the medium to long term, reinvestment will be targeted to improve the Estate's longer term income profile.
42. A review of Investment Estate practices is underway and to be completed by February 2023 to accord with the Chartered Institute of Public Finance and Accountancy (CIPFA) requirements and guidance.
43. On occasion investment estate property is required to support the Council's wider property and operational objectives. For example, the former Tennis Centre at Ocean Park is required to enable the delivery of a compliant new Willows High School. As such, the commercial model for the centre will need to be realigned as part of the work to bring forward the new high school.
44. The Council has successfully acquired the leasehold interest in five public houses that were formally owned and operated by Brains across the city. The Council already owned the freehold interest in the land these buildings occupied and therefore has now established an unfettered freehold reversion through the acquisition of the leasehold interests.
45. Brains were not able to operate the pubs commercially and following a review of their business, had sub-let the pubs to Marsdens on short-term flexible leases. Marsdens were also not prepared to take on long-term leases. The Council will therefore review the options for each site with a view to establishing a viable income (capital or revenue) back into the Investment Estate.

#### Non-Operational Estate

46. The Corporate Property Strategy 2021-26 detailed the results of a review of the non-operational estate. This review provided a better understanding of the assets within the portfolio and their performance. A number of key themes were identified from the review.
  - Backlog maintenance with no allocated budget to address
  - Health & Safety compliance concerns
  - Reactive estate management
  - Inconsistent tenure arrangements in particular within retail parades
  - Status, strength and presence of tenants



These issues are now being addressed through a revised and more proactive management approach and further recourse to ensure improved performance of the non-operational estate.

47. The Council's retail parades were declared surplus to Council requirement through the 2018/19 APP. As a result, a programme has been set to undertake the relevant tenancy management, ensure any long leaseholders continue to have a mortgageable asset and undertake the necessary due diligence to bring forward the parades for disposal.
48. In total four retail parades have been disposed of to date and a further 4 are being prepared as part of this year's APP. The capital receipts are ringfenced to the general fund.
49. In addition to the retail parades, further assets have been assessed and declared surplus to Council requirements. The majority of the assets are let on commercial terms and disposal gives rise to a permanent loss of income to the Council's budgets.

#### **Local Member consultation**

50. Member engagement will take place through the implementation of the plan.

#### **Scrutiny Consideration**

51. The Policy review and Performance Scrutiny Committee is due to consider this report on 26 September. Any comments received will be reported at the meeting.

#### **Reasons for Recommendations**

52. To enable Cabinet to approve the 2022/23 Annual Property Plan.

#### **Financial Implications**

53. The report sets out the 2022/23 Annual Property Plan (APP) and the overall strategies and targets for the proposed management of the Council's land and property estate. This serves as the second-year implementation plan of the five-year Corporate Property Strategy (2021-2026) approved by Cabinet in December 2021.
54. It is essential that annual plans continue to support improved operational efficiencies and align with the Council's overall strategies and priorities, financial objectives, available resources and service requirements.
55. General updates are provided on the property plan implications for corporate priorities and initiatives including the Council's One Planet strategy, hybrid working and modernisation as well as the Council housing new build programme.
56. There are no detailed costings set out within this report or the APP. It is essential any commitments arising from this plan are affordable, aligned

to the budget framework and that resources are allocated to priority areas. The successful delivery of outcomes will need to be underpinned by an effective and robust governance and assurance framework that delivers clear and measurable results through informed decision making.

57. The APP considers land and property transactions across the Council's estate which will include large scale regeneration schemes such as the International Sports Village and the Atlantic Wharf masterplan. The report identifies that these are of such a scale as to require specific governance and decision making and will require individual future reports to Cabinet.
58. Similarly, separate reports to Cabinet are planned later in the year for the STAR and Toys R Us sites. These reports should clearly identify any ongoing revenue and capital budget implications and funding sources and should ensure that any proposals for future use of these sites is affordable and aligns with other Council priorities and budgeting.
59. The report sets out that the principle that surplus Council owned sites will be firstly assessed for suitability to meet Housing objectives. Any site appropriations to the Housing Revenue Account should be in line with related governance arrangements including evidenced independent market valuations.
60. In respect of the Council's One Planet Strategy and decarbonisation targets, several initiatives such as refit, behaviour change, passive decarbonisation of the grid and rationalisation of property are considered to contribute to future changes to the carbon footprint for the Authority. Any plans and programmes which develop from these initiatives will need to be supported by robust business cases which clearly identify the funding source and provide assurance that they remain affordable within the Council's overall financial envelope and medium-term financial plan. Investment in benchmarking tools planned to be used for more accurate carbon output measures will be funded by the £80,000 budget identified through the One Planet Cardiff programme funding.
61. The report highlights the modernisation programme which is the planned investment, repair and improvement of corporate and education properties with a provisional total value of £50m for 2022/23 (£3.2m for corporate buildings and £46.8m for education buildings). Any spend must be within approved revenue and capital budgets and align with other corporate priorities.
62. A high-level update on the SOP Band B implementation programme is provided with land acquisitions and disposals supporting the financing of the programme. Additionally, the report identifies that consideration is being given to the future use of the Tennis Centre within the Education estate. It is planned that future transactions will be reported through the Schools Programme Board and to Cabinet.
63. The report highlights the target for reductions in running costs of the property estate (£100k for 2022/23) and the current pressures on these targets as a result of the utility markets and energy price increases. Detailed monitoring of the position will be essential to understand ongoing

risks, any opportunities from existing purchasing arrangements and the potential for future efficiencies. A budget shortfall is recognised in the report with regard to asset renewal revenue works under £6,000. These issues and any significant risks and future pressures must be detailed and considered as part of the Council's future budget setting processes and medium-term financial plan.

64. The report also provides an update on performance against the £600,000 increased target for rental income. This was an additional target anticipated to be achieved by 2025/26 through completion of outstanding leases, regearing of leases and relets at higher commercial market rents. This target will need to be tested and continually reviewed to ensure it is at an achievable level and is not based on the acquisition of new commercial investment solely for yield. Any such target also needs to consider the capacity and skills required to ensure that lease reviews are undertaken when due. Consideration will need to be given to the achievability of these targets within available resources.
65. Where properties are the subject of lease agreements, monitoring and enforcement of tenants' obligations to repair should be taken to ensure liabilities do not fall back on the Council. In the event of liabilities being accepted (after a robust options appraisal) then these will need to be managed within existing resources and prioritised with other commitments. Where any new Community leases are proposed to be approved, these should be supported by a robust business case including consideration of sustainability of any entity to manage and operate that asset.
66. Where the Council has entered into lease agreements for its use of properties or land, regular review of the use of such properties needs to be undertaken to ensure decisions can be made in advance of any options periods identified in the lease. Any such options appraisal will need to include any dilapidations payable as well as the benefits in terms of savings in expenditure where the property can be relinquished. Where there are such leased properties, provisions should be created for future lease costs such as dilapidations as part of the continued use of such sites.
67. The report provides an update on the £40m general fund target for non-earmarked capital receipts. Capital receipts from the disposal or appropriation of General Fund land and property are critical to support the Council's capital programme. The Corporate Property Strategy includes a target for achievement of £25m capital receipts by 2025/26 with £2.1m General Fund receipts achieved in 2021/22. The report identifies that the target for 2022/23 is £5.5m with £2.5m achieved as at Q3. Where such targets are set, these need to be demonstrated as achievable within a short timescale, as continued inclusion of a capital receipts target in the budget framework represents a risk and will need to be reviewed as part of the budget framework for 2023/24.
68. Lost income from sites to be disposed of towards the £40m target that are not part of the investment property estate will have an impact on the property budget and will need to be managed within the existing budget or as part of the increased income target. Where such sites are to be

disposed of, there needs to be a clear rationale for disposal as part of the Council's governance processes including consideration of yield lost and the extent of any liability inherent in the asset which forms the rationale for disposal.

69. Where proposals are reliant on the generation of earmarked receipts, there is a risk to the budget framework and unplanned increases to the level of borrowing if such receipts are not realised in terms of value and timing. Where additional sites are acquired to meet strategic aims, the holding costs and VAT implications should be a key financial consideration of the business case development at an early stage.
70. The report identifies that a review of Investment Estate practices is due to be completed by February 2023 to accord with CIPFA requirements and guidance and it is anticipated that any outcomes and actions arising from this review will form part of any future report to Cabinet.

### **Legal Implications**

71. The Council has an obligation to ensure value for money in its management, acquisition and disposal of land and property as public assets. The Council's Acquisition and Disposal of Property Procedure Rules in Part 4 of the Council's Constitution sets out the matters to be considered with reference to Property transactions.

### **Equalities & Welsh Language**

72. In considering this matter the decision maker must have regard to the Council's duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties Councils must, in making decisions, have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. Protected characteristics are: (a) Age, (b) Gender reassignment, (c) Sex, (d) Race – including ethnic or national origin, colour or nationality, (e) Disability, (f) Pregnancy and maternity, (g) Marriage and civil partnership, (h) Sexual orientation, (i) Religion or belief – including lack of belief.
73. When taking strategic decisions, the Council also has a statutory duty to have due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage ('the Socio-Economic Duty' imposed under section 1 of the Equality Act 2010). In considering this, the Council must take into account the statutory guidance issued by the Welsh Ministers ([WG42004 A More Equal Wales The Socio-economic Duty Equality Act 2010 \(gov.wales\)](#)) and must be able to demonstrate how it has discharged its duty.
74. An Equalities Impact Assessment aims to identify the equalities implications of the proposed decision, including inequalities arising from socio-economic disadvantage, and due regard should be given to the outcomes of a Equalities Impact Assessment. The decision maker should

be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards.

75. The Well-being of Future Generations (Wales) Act 2015  
The Well-Being of Future Generations (Wales) Act 2015 ('the Act') places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible. In discharging its duties under the Act, the Council has set and published wellbeing objectives designed to maximise its contribution to achieving the national wellbeing goals. The wellbeing objectives are set out in Cardiff's Corporate Plan 2020 -23.
76. When exercising its functions, the Council is required to take all reasonable steps to meet its wellbeing objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the wellbeing objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.
77. The wellbeing duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:
- Look to the long term
  - Focus on prevention by understanding the root causes of problems
  - Deliver an integrated approach to achieving the 7 national well-being goals
  - Work in collaboration with others to find shared sustainable solutions
  - Involve people from all sections of the community in the decisions which affect them
78. The decision maker must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible online using the link below:  
<http://gov.wales/topics/people-and-communities/people/future-generations-act/statutory-guidance/?lang=en>

### **Property Implications**

79. All property considerations are described in the report.

## **HR Implications**

80. There are no HR implications for this report

## **RECOMMENDATIONS**

Cabinet is recommended to:

1. Approve the 2022/23 Annual Property Plan attached at Appendix 1.
2. Delegate authority to the Director of Economic Development to complete the disposal of land at St Teilo's, via appropriation by the HRA, at market value of the property less any relevant ring-fenced sums.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Neil Hanratty Director of Economic Development</b>
	<b>22 September 2022</b>

*The following appendices are attached:*

Appendix 1: Annual Property Plan 2022/23

Appendix 2: Annual Property Plan 2022/23 transactions list

# Annual Property Plan 22/23



Tudalen 833

**STRONGER  
FAIRER  
GREENER**



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## 1. Summary

The Annual Property Plan (APP) is an annual report that sets out the property programme for the forthcoming year; provides an in-year update; and summarises key property related programmes. The APP applies to the operational portfolio which comprises land and property used to deliver or support Council services, and also the leased Investment and Non-operational portfolio's.

The Property Strategy 2021-26 established property performance targets to be achieved over a five-year period. The APP reports progress towards these targets through completed land and property transactions. The APP also lists proposed transactions for the present year, seeking authority from cabinet to proceed.

The property strategy 21-26 identified five performance targets:

- **Carbon reduction**  
Supporting delivery of the One Planet Cardiff strategy and contributing to net zero by 2030. Reduce the carbon footprint in the Built Environment by 30%.
- **Modernisation: Completion of all Priority 1 works**  
Achieve 100% of Priority 1 programmed asset works in each financial year based on an annually reviewed rolling programme.
- **Efficiency: Running cost reduction**  
Records the degree to which the Council is using its assets in a more cost-effective way and reducing revenue costs. Reduce the running cost by £6m.
- **Capital Receipts**  
Commitment to ensure support to the Council's capital programme via disposal of land and property. Achieve £25m general fund capital receipts.
- **Investment Estate: Rental income**  
Target to increase the rental income from leased property by £600k.

### APP 22/23 Targets

Each year the APP determines targets to be achieved annually that then contribute to the strategy target. The 2022/23 targets are as below:

	Carbon reduction	Priority 1 works commissioned	Running Cost reduction	General Fund Capital Receipts	Investment estate target
Target	<b>Maintain current position</b>	<b>100%</b>	<b>£100k</b>	<b>£5.5m</b>	<b>n/a (5 year target)</b>

Table 1. Annual Property Plan targets 2022/23

## 2. Background

The Council's land and property estate is considerable, with property running costs representing the second largest call on the Council's budget after staff costs. Changes to the way in which the Council delivers its services is inextricably linked to the management of its operational property estate and therefore strategic estate management offers an on-going opportunity to support improved efficiency and service delivery. This is particularly relevant in the post COVID recovery period as services adapt to working in new ways and different environments, for example the adoption of Hybrid Working models.

Land and property management is a key strategic activity which aligns the Council's service and financial objectives with the property estate. It ensures optimisation of property assets to best support the organisation's business goals and objectives. The requirement for effective land and property management is based on treating property as a corporate resource which forms the basis of the County Estates team and Corporate Landlord principles.

In December 2021, Cardiff Council adopted a new five-year Corporate Property Strategy (2021-2026) setting out a framework within which all Council property related matters are to be managed. The Cabinet approved Strategy, entitled "*Leaner and Greener*", established a series of targets over the five-year period designed to support core corporate objectives relating to service delivery, regeneration and the Council's budget.

The Annual Property Plan (APP) is an annual document which serves as the implementation plan for the Strategy. The annual targets within the APP contribute towards the five year targets established within the Property Strategy, setting out the transactions completed from the previous financial year, as well as the transactions planned for the current financial year. The APP also provides updates on any relevant property projects or initiatives and their relevance to the property strategy.

An Annual Property Plan will be published for each year of the five year Corporate Property Strategy. Financial year 2021/22 was the first APP in the new strategy and APP 2022/23 is the second.

## 3. APP 21/22 Acquisitions

Property	Tenure	Action / Status	Notes
Land at ISV (Greenbank)	Freehold	Purchased	ISV development
Former HMRC Offices, Ty Glas Avenue	Freehold	Purchased	New school site
Land at Tyndall Street	Freehold	Purchased	New school site
1, 2 & 3 Cwrt Bessemer	Freehold	Purchased	Housing acquisition

Table 2. Acquisitions 2021/22

#### 4. APP 21/22 performance

	Total estate Running cost reduction	Priority 1 works commissioned	Built Environment Carbon reduction	General Fund Capital Receipts
<b>APP target 2021/22</b>	<b>£300,000</b>	<b>100%</b>	<b>-1%</b>	<b>£15,000,000</b>
<b>Achieved 2021/22</b>	<b>£257,098</b>	<b>100%</b>	<b>+8%</b>	<b>£13,538,297</b>

Table 3. Annual Property Plan targets 2021/22

Transactions that did not complete in 2021/22 have been moved into the 2022/23 plan.

#### 5. APP 22/23 Overview

The Corporate Property Strategy 2021-26 set out the strategic intent for key elements of the property estate. These areas cover a broad area of work programmes and are subject to specific governance. They impact performance of the estate at a strategic level with notable updates including:

##### Hybrid Working

Development of the Council's accommodation strategy in relation to Hybrid Working is at an advanced stage. This is an important workstream in the context of the Council's operational estate, particularly in regards to Core Office, as the outcome will have a significant impact on the Council's future office requirements.

Finalisation of the Hybrid Working model will be a key consideration in the retain / remodel / relinquish decision making process within the operational estate. This in turn has a linked dependency with the modernisation and carbon reduction initiatives as the Council seeks to make the best value investments that maximise the objectives in those specific areas. For example, it will be key to invest in properties and spaces that the Council intends to retain over the long term and are aligned to service requirements.

##### Regeneration

Utilisation of the Council's land and property assets is fundamental to the delivery of large-scale regeneration schemes aligned with the Council's Economic Development and Wellbeing initiatives. Examples include the International Sports Village and the Atlantic Wharf masterplan. These schemes are of a scale that requires specific governance and individual cabinet reports. The related land and property transactions are reported through the Annual Property Plan. Given the community impact of major regeneration schemes it is important to ensure appropriate consideration is given to equality impact and future generations.

The remaining vaccination centres at Bayside and Splott are due to close this financial year and the sites will return to Council management. The former STAR Centre will

be subject to a housing redevelopment scheme, and the former Toys R Us building will be brought forward as part of the International Sports Village regeneration.

### Housing

The Council's Housing targets remain a corporate priority. The Property Strategy established the principle that any Council owned sites declared surplus to service requirements should be assessed for suitability to meet Housing objectives. This is a key element of the decision-making process when disposing of surplus sites.

The appropriation of general fund sites to the Housing Revenue Account (HRA) has made up a significant proportion of the annual capital receipt target over the course of the last 6 years. As new Housing programmes are developed it is anticipated further appropriations will be required to ensure an adequate supply of suitable sites. These will be reported through the Annual property plan and specific HRA governance.

### SOP

Implementation of the Sustainable Communities for Learning Band B programme is ongoing. The replacement Fitzalan High School on Leckwith Road is at an advanced stage of construction and the St Mellons CiW Primary is also progressing well on site. A number of other projects are progressing through the design phase, including the Fairwater Campus and the new Willows High School. The programme has successfully developed Net Zero Carbon (NZC) standards for new build schools and improved procurement processes. Welsh Government has supported strategic land transactions to enable the implementation of the programme, such as the acquisition of the former HMRC site at Ty Glas, Llanishen. Risks remain in relation to increasing inflation in the construction sector and changing demographics. A strategic plan will be brought forward in due course to establish principles for decision making and priorities. An annual programme update report will also be brought forward in the Autumn 2022. There is limited land available within the Council's estate so there may be further acquisitions and disposals to support future projects. Any transactions would be reported through Cabinet and the outlined in the Annual Property Plan.

### Corporate Estate

In addition to the impact of Hybrid Working on core office noted above, the Council's operational estate is under constant review to ensure alignment with changing service needs. Statutory services such as Social Services continue to evolve delivery models post COVID that may see property requirements change. Other areas of the estate under review include the Council's operational depots and the full range of sports & leisure facilities. It is important to consider service needs together with the Council's Financial, Hybrid Working, Carbon Reduction and Modernisation programmes to enable good property decisions over the short, medium and long-term.

### Land

The Council estate includes considerable land assets principally used either operationally for purposes such as Education, recreation and public open space or is held of planning purposes to deliver future development and regeneration. Where land becomes surplus to service requirements it is assessed to determine most appropriate future use. This includes alternative operational use by other service areas to deliver different services i.e. a change of use. However in some instances the land is declared surplus to Council requirements and can be considered for disposal.

The delivery of various Council objectives is dependent on the availability of land. Examples include established regeneration programmes such as Housing and SOP. More recently One Planet Cardiff and the Council’s objectives relating to sustainability and carbon reduction have introduced land dependent projects such as Coed Caerdydd and community food growing. Finally the Council has a capital receipts target to support the capital programme. The decision making process will consider where land could be used to meet more than one of these objectives and

### One Planet Cardiff – Carbon Neutral Built Environment

The One Planet Cardiff strategy seeks to achieve a carbon neutral Cardiff Council by 2030. The Built Environment is one of the key components to the total carbon footprint of the Council. The Built Environment is comprised principally of the Corporate and SOP estates. The Property Strategy 2021-26 set a target of reducing the carbon footprint by 30% in the Built Environment by 2026.

The table below shows the carbon footprint of the Cardiff Council built environment over the last three years. 2019/20 was unaffected by COVID and serves as an effective benchmark year. The trend shows a considerable reduction in the carbon footprint in 2020/21. This was largely due to the Council closing operational buildings as part of the COVID response. 2021/22 saw an increase from the previous year, but not back to 2019/20 levels. The increase in carbon footprint in the built environment in 2021/22 was largely due to the easing of COVID restrictions and the reopening of Council operational properties.

	2019/20	2020/21	2021/22
<b>Built Environment Carbon Footprint tCO2e</b>	19,000	15,000	16,300

**Table 4. Carbon footprint in the Built Environment 2019/20 to 2021/22**

The APP carbon reduction target for 2022/23 is to maintain the carbon footprint at its current level and minimize any rise back to previous levels.

The Property Strategy sets out the key areas of focus to permanently reduce the built environment carbon footprint including modernisation of the estate through refit, behavior change, more efficient use of our properties, passive decarbonization of the grid and rationalisation of property. These schemes are ongoing and will take time to mature and make a notable change to the annual carbon footprint. Significant decreases may not be seen until later years of the Property Strategy and the One Planet Cardiff Strategy.

The Council has invested in new pilot benchmarking tools in both the corporate and education estates. These tools provide up-to-date and accurate utility usage allowing for a more accurate carbon output calculation. Further budget has been secured through the One Planet Cardiff carbon reduction programme to install further benchmarking tools within the corporate estate. Installation is planned over the next two years. It is important that the Council is able to report the carbon footprint consistently year on year over the course of the One Planet Cardiff strategy.

Preliminary work is underway to develop Refit 4. Nineteen school sites have benefited from previous Refit programmes delivering an average of 13% carbon reduction. Refit 4 will once again include schools but will also be extended to the corporate estate. Due to the scale of

works required to meet One Planet Cardiff carbon reduction targets, Refit 4 will be the largest programme thus far. The detail of the programme is currently being developed and will be subject to a separate cabinet report.

In regards to carbon offsetting, in its first planting season (21/22) Coed Caerdydd enhanced the city's traditional tree planting activities to achieve an extra 8 ha of new woodland areas across the city (20,000 individual trees in total). This represents an increase of over 350% of the traditional planting activity.

The overall target for One Planet Cardiff is to increase canopy cover across the city from 18.9% to 25% by 2030 which requires 839 Ha of land. As noted above, there is a range of competing demands for land to deliver other Council objectives. The Authority currently does not have sufficient land in its portfolio to meet the quantities needed. It is likely private land holdings will need to be utilised where possible and opportunities arise.

### Modernisation

Modernisation of the estate describes the planned investment, repair and improvement of the councils corporate and education properties. The Property Strategy sets a target of ensuring all priority 1 works identified (through surveys, suitability assessments and statutory maintenance) are commissioned on an annual basis. This was achieved in 2021/22 with £21.8m works commissioned in total, £2.3m in the corporate estate and £18.5m in education.

The programme in 2022/23 is likely to be more extensive, with a provisional total works value of £54m, split £3.2m corporate and £51m education. This programme is draft and subject to affordability and contractor availability. A key piece of ongoing work relates to the alignment of planned capital works (asset renewal) with the carbon reduction refit proposals. It is important that going forward these work streams are planned together and complement each other to ensure maximum value for money and impact within the retained estate.

The education estate has seen an increase in spend from circa £13.1m in 2020/21 to £18.5m in 2021/22. Despite the increase spend, significant risks and challenges still remain due to the age of the estate. Despite the increase in planned works, there are still regular non-planned works some of which are significant. Examples include Stacey Primary School major refurbishment; Tremorfa Nursery structural works; Gwaelod Y Garth demountables; various stonework issues and underground water leaks. Due to the peak of secondary mainstream places and increasing ALN demands, the programme is also bringing forward a number of larger schemes to accommodate the sufficiency demands. Further work is underway to assess the condition of the education estate and to set the annual asset programme of work.

For reasons of materiality and consistency with other capital controls, a de minimis level of expenditure is applied below which capital spend is treated as revenue. This de minimis level is set at a £6,000 and is applied at a scheme/project level rather than on an invoice-by-invoice basis.

In the absence of a budget for undertaking asset renewal work of value less than £6,000 because the revenue budget is small in value, such works are being undertaken in a reactive way and may not be addressed until the works situation approaches a critical state. County estates will work with finance colleagues to consider appropriate budget options for the undertaking of proactive asset renewal works below the capital de minimis level of £6,000 in future years.

In July 2022 Cabinet approved the procurement of the third generation building framework. Authority was delegated to the Director of Economic Development to complete the procurement. The new framework is scheduled to take effect from 1/4/23.

### Running Cost reduction through relinquishment

The property strategy identifies a £6m reduction target over the course of the strategy. The principle means of achieving savings is through rationalisation of the Council's operational footprint. The implementation of hybrid working, and reviews of the operation estate are anticipated to deliver larger running cost savings in later years of the strategy. In 2021/22, a reduction of £260k was achieved. £100k is the target for 22/23.

The cost of energy has risen significantly over the last 18 to 24 months. Cardiff Council is part of a UK wide consortium via CCS (Crown Commercial Services) which includes all other public sector bodies. The CCS purchase our power and gas on the market over a set period of time. As part of this we have large economies of scale to support us with getting the very best prices on the market and to negate as much risk as possible. As such we have been protected from the widely publicised energy spikes with the increases not filtering through until April 2023.

Both the CCS and Cardiff Council's in-house Energy Team continue to monitor the utility markets and work closely with finance to set budgets. The prevailing sentiment is that the next financial year will be the highest in terms of cost and although it will not go back down to historic levels (pre-COVID) it is anticipated the market will soften slightly from 2024. The market is expected to remain high until at least 2030.

### Capital Receipts

Capital Receipts from the disposal or appropriation of general fund land and property is critical to support the Council's capital programme. The Corporate Property Strategy targets achieving £25m Capital Receipts by 2025/26. £2.1m general fund receipts were achieved in 2021/22. The target for 2022/23 is £5.5m with £2.5m achieved as of Q3.

The former Glan Morfa school site will be appropriated to the HRA in 2022/23, implementing a meanwhile community use prior to redevelopment in future years.

As part of this Cabinet Report and per the APP list, specific approval is being sought for delegated authority to complete the disposal, via appropriation of by the HRA, of land at the former Llanedeyrn Family Centre and St Teilo's School. The land has been rendered surplus via the School Organisational Planning programme. The capital receipt captured will include provision for ring fenced sums for new school pitches and other relevant community proposals.

### Investment Estate

The Property strategy identifies a £600k net increase in rental income by 2025/26. This is not tracked in the APP on an annual basis due to the nature of the transactions in the portfolio. However, it is managed through established governance involving Estates and Finance officers.

The Council's Investment Estate will continue to be managed with a commercial approach, completing outstanding lease events and where opportunities arise, seek to re-gear leases and potentially re-let at higher commercial market rents. Currently, there are 17 rent reviews to implement across the Investment portfolio in FY 22/23, and 11 in FY 23/24. These comprise a mix of stepped rents, RPI rents, and open market reviews.

Where a decision is taken to dispose of an investment asset, this may have a short term adverse impact on income receivable, until the disposal proceeds are re-invested. In the medium to long term, reinvestment will be targeted to improve the Estate's longer term income profile.

A review of Investment Estate practices is underway and to be completed by February 2023 to accord with the Chartered Institute of Public Finance and Accountancy (CIPFA) requirements and guidance.

On occasion investment estate property is required to support the Council's wider property and operational objectives. For example, the former Tennis Centre at Ocean Park is required to enable the delivery of a compliant new Willows High School. As such, the commercial model for the centre will need to be realigned as part of the work to bring forward the new high school.

The Council has successfully acquired the leasehold interest in five public houses that were formally owned and operated by Brains across the city. The Council already owned the freehold interest in the land these buildings occupied and therefore has now established an unfettered freehold reversion through the acquisition of the leasehold interests.

Brains were not able to operate the pubs commercially and following a review of their business, had sub-let the pubs to Marsdens on short-term flexible leases. Marsdens were also not prepared to take on long-term leases. The Council will therefore review the options for each site with a view to establishing a viable income (capital or revenue) back into the Investment Estate.

### Non-Operational Estate

The Corporate Property Strategy 2021-26 detailed the results of a review of the non-operational estate. This review provided a better understanding of the assets within the portfolio and their performance. A number of key themes were identified from the review.

- Backlog maintenance with no allocated budget to address
- Health & Safety compliance concerns
- Reactive estate management
- Inconsistent tenure arrangements in particular within retail parades
- Status, strength and presence of tenants

These issues are now being addressed through a revised and more proactive management approach and further recourse to ensure improved performance of the non-operational estate.

The Council's retail parades were declared surplus to Council requirement through the 2018/19 APP. As a result, a programme has been set to undertake the relevant tenancy management, ensure any long leaseholders continue to have a mortgageable asset and undertake the necessary due diligence to bring forward the parades for disposal.

In total four retail parades have been disposed of to date and a further 4 are being prepared as part of this year's APP. The capital receipts are ringfenced to the general fund.



In addition to the retail parades, further assets have been assessed and declared surplus to Council requirements. The majority of the assets are let on commercial terms and disposal gives rise to a permanent loss of income to the Council's budgets.

## 5.1 APP 22/23 Targets

The Corporate Property Strategy 2021-26 identified five performance targets to be achieved by the end of the strategy. Each year the APP determines targets to be achieved annually that then contribute to the strategy target. The 2022/23 targets are as below:

	Carbon reduction	Priority 1 works commissioned	Running Cost reduction	General Fund Capital Receipts	Investment estate target
Target	<b>Maintain current position</b>	<b>100%</b>	<b>£100k</b>	<b>£5.5m</b>	<b>n/a (5 year target)</b>

Table 5. Annual Property Plan targets 2022/23

## 5.2 Proposed APP programme of transactions 22/23

Operational Property Transactions			
Property	Ward	Tenure	Action / Status
St Mellons Housing site (Linc Cymru)	Trowbridge	Freehold	SOLD
Canton & Riverside Community Centre	Riverside	Freehold	Transfer to Housing Revenue Account
Wyndham Street Car park (part)	Riverside	Freehold	SELL
Old Library	Cathays	Freehold	LEASE
Former Museum Avenue PC's	Cathays	Freehold	LEASE
Heath Park Changing Rooms	Heath	Freehold	LEASE
Heath Park bungalow	Heath	Freehold	LEASE
Heath Park Hut	Heath	Freehold	LEASE
Llandaff CIW Caretakers House	Llandaff	Freehold	LEASE
Land at the Graving Docks	Butetown	Freehold	LEASE
Land at Landsea Gardens	Butetown	Freehold	LEASE

Roath Park House	Plasnewydd	Freehold	LEASE
Roath Park Pavilion	Plasnewydd	Freehold	LEASE
Land at Bessemer Close, adjacent to HWRC	Grangetown	Freehold	LEASE
Llanedeyrn Sports Hall, adjacent St Teilos land disposal	Pentwyn	Freehold	LEASE
Ton yr Ywen / Maes y Coed Changing Rooms	Heath	Freehold	LEASE
3G pitch at Canal Park land	Butetown	Freehold	LEASE
Land at Morganstown Changing Rooms	Radyr	Freehold	LEASE
Pitches at Fitzalan School	Canton	Freehold	LEASE
Former Riverside Changing Rooms	Llanrumney	Freehold	LEASE
Former Llandaff Fields Bowling Pavilion & changing rooms	Riverside	Freehold	LEASE
Land at Hailey Park for pumping station	Llandaff North	Freehold	LEASE
Land at Llanrumney Hall for MUGA	Llanrumney	Freehold	LEASE
Extension at former Fairwater Changing Rooms	Fairwater	Freehold	LEASE
Land to rear of Llanishen Leisure Centre	Llanishen	Freehold	LEASE
Western Control Centre cold war bunker (	Llandaff	Freehold	LEASE
Dispenser Gardens Rangers Hut	Riverside	Freehold	LEASE
Plasturton Gardens Rangers Hut	Riverside	Freehold	LEASE

<b>School Organisational Planning</b>			
Property	Ward	Tenure	Action / Status
Former Llanedeyrn Family Centre & St Teilo's Land	Pentwyn	Freehold	Transfer to Housing Revenue Account
Coed Glas caretakers house	Llanishen	Freehold	Transfer to Housing Revenue Account
Part Former Glan Morfa school site	Splott	Freehold	Transfer to Housing Revenue Account

<b>Land Disposals</b>			
Property	Ward	Tenure	Action / Status
Land at Rhydlafer Drive	Pentyrch / St Fagans	Freehold	SELL
Land at Coed Ceiros	Rhiwbina	Freehold	SELL
Land adjacent to Aldi, Treseder Way	Caerau	Freehold	SELL
Land adjacent to Beechley Drive shops	Fairwater	Freehold	SELL

<b>Retail Parade and Non-Operational Disposals</b>			
Property	Ward	Tenure	Action / Status
Paddlesteamer	Butetown	Freehold	SOLD
Heol Trenewydd Retail Parade 6-14	Caerau	Freehold	SELL
Grand Avenue Retail Parade 61	Ely	Freehold	SELL
Grand Avenue Retail Parade 71	Ely	Freehold	SELL
Grand Avenue Retail Parade 73	Ely	Freehold	SELL
Grand Avenue Retail Parade 79	Ely	Freehold	SELL
Grand Avenue Retail Parade 81	Ely	Freehold	SELL
Burnham Avenue Retail Parade 183-191	Llanrumney	Freehold	SELL
Harris Avenue Retail Parade 85-87	Rumney	Freehold	SELL
Pwllmelin Road 171A	Fairwater	Freehold	SELL
Pwllmelin Road 173	Fairwater	Freehold	SELL
58 - 68 Plasmawr Road	Fairwater	Freehold	SELL

Investment Estate Transactions			
Merchant and Cory's Buildings	Butetown	Freehold	Sale contract exchanged
Westgate Street NCP car park	Cathays	Freehold	Disposal
Unit 14 Ipswich Road (Greenfrog)	Penylan	Freehold	Option to lease

**Table 6. Annual Property Plan – transaction programme 2022/23**

Appendix 2: APP programme of transactions for 2022/23:

Operational Property Transactions			
Property	Ward	Tenure	Action / Status
St Mellons Housing site (Linc Cymru)	Trowbridge	Freehold	SOLD
Canton & Riverside Community Centre	Riverside	Freehold	Transfer to Housing Revenue Account
Wyndham Street Car park (part)	Riverside	Freehold	SELL
Old Library	Cathays	Freehold	LEASE
Former Museum Avenue PC's	Cathays	Freehold	LEASE
Heath Park Changing Rooms	Heath	Freehold	LEASE
Heath Park bungalow	Heath	Freehold	LEASE
Heath Park Hut	Heath	Freehold	LEASE
Llandaff CIW Caretakers House	Llandaff	Freehold	LEASE
Land at the Graving Docks	Butetown	Freehold	LEASE
Land at Landsea Gardens	Butetown	Freehold	LEASE
Roath Park House	Plasnewydd	Freehold	LEASE
Roath Park Pavilion	Plasnewydd	Freehold	LEASE
Land at Bessemer Close, adjacent to HWRC	Grangetown	Freehold	LEASE
Llanedeyrn Sports Hall, adjacent St Teilos land disposal	Pentwyn	Freehold	LEASE
Ton yr Ywen / Maes y Coed Changing Rooms	Heath	Freehold	LEASE
3G pitch at Canal Park land	Butetown	Freehold	LEASE
Land at Morganstown Changing Rooms	Radyr	Freehold	LEASE
Pitches at Fitzalan School	Canton	Freehold	LEASE
Former Riverside Changing Rooms	Llanrumney	Freehold	LEASE
Former Llandaff Fields Bowling Pavilion & changing rooms	Riverside	Freehold	LEASE
Land at Hailey Park for pumping station	Llandaff North	Freehold	LEASE
Land at Llanrumney Hall for MUGA	Llanrumney	Freehold	LEASE

Extension at former Fairwater Changing Rooms	Fairwater	Freehold	LEASE
Land to rear of Llanishen Leisure Centre	Llanishen	Freehold	LEASE
Western Control Centre coldwar bunker	Llandaff	Freehold	LEASE
Dispenser Gardens Rangers Hut	Riverside	Freehold	LEASE
Plasturton Gardens Rangers Hut	Riverside	Freehold	LEASE

### School Organisational Planning

Property	Ward	Tenure	Action / Status
Former Llanedeyrn Family Centre & St Teilo's Land	Pentwyn	Freehold	Transfer to Housing Revenue Account
Coed Glas caretakers house	Llanishen	Freehold	Transfer to Housing Revenue Account
Part Former Glan Morfa school site	Splott	Freehold	Transfer to Housing Revenue Account

### Land Disposals

Property	Ward	Tenure	Action / Status
Land at Rhydlafer Drive	Pentyrch / St Fagans	Freehold	SELL
Land at Coed Ceiros	Rhiwbina	Freehold	SELL
Land adjacent to Aldi, Treseder Way	Caerau	Freehold	SELL
Land adjacent to Beechley Drive shops	Fairwater	Freehold	SELL

### Retail Parade and Non-Operational Disposals

Property	Ward	Tenure	Action / Status
Paddlesteamer	Butetown	Freehold	SOLD
Heol Trenwydd Retail Parade 6-14	Caerau	Freehold	SELL
Grand Avenue Retail Parade 61	Ely	Freehold	SELL
Grand Avenue Retail Parade 71	Ely	Freehold	SELL
Grand Avenue Retail Parade 73	Ely	Freehold	SELL
Grand Avenue Retail Parade 79	Ely	Freehold	SELL

Grand Avenue Retail Parade 81	Ely	Freehold	SELL
Burnham Avenue Retail Parade 183-191	Llanrumney	Freehold	SELL
Harris Avenue Retail Parade 85-87	Rumney	Freehold	SELL
Pwllmelin Road 171A	Fairwater	Freehold	SELL
Pwllmelin Road 173	Fairwater	Freehold	SELL
58 - 68 Plasmawr Road	Fairwater	Freehold	SELL

### Investment Estate Transactions

Merchant and Cory's Buildings	Butetown	Freehold	Sale contract exchanged
Westgate Street NCP car park	Cathays	Freehold	Disposal
Unit 14 Ipswich Road (Greenfrog)	Penylan	Freehold	Option to lease

**Table 3. Annual Property Plan - programme 2022/23**

Mae'r dudalen hon yn wag yn fwriadol



**CABINET MEETING: 28 SEPTEMBER 2022**

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**CORPORATE PARENTING ADVISORY COMMITTEE ANNUAL REPORT 2021-2022**

**EDUCATION (COUNCILLOR SARAH MERRY)  
SOCIAL SERVICES (COUNCILLOR ASH LISTER/COUNCILLOR NORMA MACKIE)**

**AGENDA ITEM: 10**

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**Reason for this Report**

1. The Terms of Reference for the Corporate Parenting Advisory Committee requires an Annual Report to be submitted to Cabinet and Council on the work of the Committee over the year.
2. A copy of the Committee's Annual Report 2021/22 is attached at Appendix A. This report outlines the Committee's activities from November 2020 – January 2022

**Background**

3. The Corporate Parenting Advisory Committee is responsible for advising the Council and for advocating on the collective behalf of all care leavers and children looked after by Cardiff Council, to ensure that they receive the best possible care and support.
4. The role of the Committee is to actively promote and operate collective responsibility between the Council, Social Services, Health, Education and other statutory agencies to achieve good parenting for all children in the care of Cardiff Council and to ensure that they are appropriately safeguarded to achieve the best possible chances in life.

**Issues**

5. Due to a change in operating model to focus on the challenges raised by the global pandemic 2 Committee meetings were cancelled in the municipal period in 2020. The further 2 Committee meetings that took place in November 2020 and March 2021 are included in the report.
6. The report outlines several activities undertaken by the Committee covering the period November 2020 – March 2022. Work of the Committee within this period includes:

- The development of a new Terms of Reference
  - The development of a new Corporate Parenting Protocol for the Committee
  - Involvement in the development of the revised Corporate Parenting Strategy
  - Engagement session with Children and young people
7. Following agreement from members of the Committee, the Forward Work programme and the four meetings held from May 2021 to January 2022 were based around the four of the five priorities outlined in the Corporate Parenting Strategy.
  8. The Committee received updates from partners, services and teams based on the following themes during these 4 meetings:

**Priority 1: Improving emotional well-being and physical health**

**Priority 2: Better connections, improved relationships**

**Priority 3: A comfortable safe stable home whilst in care and after**

**Priority 4: Educational achievement, employment, and training**

### **Young people Participation**

9. The National Youth Advocacy Service (NYAS) are commissioned by Cardiff Children's Services to deliver a participation service called the Bright Sparks group to children and young people aged 11-25 needing care and support. The principal objective is to ensure children and young people are afforded a voice, becoming active participants in shaping policy and service provision within the council and within a wider external context.
10. At each Committee meeting the Participation Officer from NYAS Cymru attends to inform the Committee of work undertaken by members of the Bright Sparks group in line with the Priorities in the Corporate Parenting Strategy. The updates also provide feedback from young people in order to strengthen the voice of young people and inform the Committee of the challenges, achievements and views of care experienced young people in Cardiff.
11. In October 2021, the Chair of the Corporate Parenting Advisory Committee met with members of the Bright Sparks group via an engagement session. The purpose of the session was for members of the Bright Sparks group to find out more about the role of the Committee and role of the Chair. The session also helped the Chair of the Committee understand the issues directly impacting young people.
12. The session also provided an opportunity for young people and the chair to have an open discussion about their experiences and provide feedback on the Corporate Parenting Strategy.

## **Monitoring Performance**

13. Several developments have been made to help capture data and inform the Committee of key services that help to achieve deliverable outcomes to improve the lives of Children Looked After and Care leavers.
14. This has included the development of a Key Performance Dashboard, Complaints and Compliments report and progress report of the implementation of the Corporate Parenting Strategy.

## **Scrutiny Consideration**

15. The Children and Young People's Scrutiny Committee considered the Annual report on March 15th, 2022.

## **Reason for Recommendation**

16. To enable the Cabinet to receive an update on the Corporate Parenting Advisory Committee

## **Financial Implications**

17. Whilst there are no direct financial implications arising, the annual report does identify an action plan which needs to ensure that any cost impacts are identified prior to implementation and are contained within existing budgetary allocations and / or external funding sources.

## **Legal Implications**

18. There are no legal implications from this report

## **HR Implications**

19. There are no HR implications from this report.

## **Property Implications**

20. There are no specific property implications arising from the Corporate Parent Advisory Committee Annual Report 2021-2022. Where there are any property transactions or valuations required to deliver any proposals, they should be done so in accordance with the Council's Asset Management process and in consultation with Strategic Estates and relevant service areas.

## **RECOMMENDATIONS**

Cabinet is recommended to recommend that Council to note the content of the Corporate Parenting Advisory Committee Annual Report 2021-2022

<b>SENIOR RESPONSIBLE OFFICER</b>
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<b>Deborah Driffield</b>
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	<b>Director of Children's Services</b>
	22 September 2022

*The following appendix is attached:*

*Appendix 1 – Corporate Parenting Annual Report*



# **CORPORATE PARENTING ADVISORY COMMITTEE**

## **Annual Report 2021/22**

## **CHAIR'S FORWARD**

I am pleased to introduce the 2021/2022 Annual Report of the Corporate Parenting Advisory Committee. The introduction of the reinvigorated Corporate Parenting Strategy in 2021 has set out an exciting and ambitious plan to help improve the lives of our Care experienced young people in Cardiff and formed the yearly work programme for the Committee.

As you can see from the report the Committee have received a variety of updates from a wide range of organisations, services and teams that have all played a role in supporting our children and young people. It has been inspiring to see all the exciting work and developments.

The introduction of a key performance dashboard has helped Committee Members gain a wider understanding of services that support our children and young people. New Terms of Reference reaffirm our commitment to hear the voices of care experienced young people in Cardiff.

A particular highlight for me was taking part in an engagement session with some members of the Bright Sparks group. It was great to directly hear their views, aspirations, and experiences in order to help the Committee to gain an understanding of the issues impacting them. These views will help to guide the agenda for the Committee and help to plan and develop projects and support for the future.

I would like to thank those managers and partners who have taken the time and effort to share their knowledge and understanding of issues, solutions, good practice, and achievements. We as Committee members are grateful for those insights.

**Councillor Sarah Merry**

**Chair, Corporate Parenting Advisory Committee**

## **DIRECTOR'S OVERVIEW**

The Annual report for 2020/2021 highlights a number of key pieces of work that the Corporate Parenting Advisory Committee has been involved in over the past year. The report focuses on the exciting refreshed Corporate Parenting Strategy and sets out Cardiff Councils and partners vision for care experienced young people in Cardiff and includes the systems that have been put in place to ensure that everyone has a part to play in supporting our children and young people.

It is important and positive to note that although the Covid 19 pandemic has raised significant challenges over the last 2 years, the Committee has continued in its work.

It is particularly encouraging to see the link between the Committee and our young people strengthen with the participation of our young people being a standing item agenda on the Committee and an engagement session being held to hear first-hand the experiences and thoughts members of the Bright Sparks group. As well as helping the Committee gain an understanding the issues impacting young people, feedback from our young people will help to develop and improve services for the future.

I would like to take this opportunity to thank members of the Committee for their contributions and active involvement throughout the year.

**Deborah Driffield**

**Director, Children's Services**

## **Introduction**

It is the collective responsibility of members, partners, and the council to ensure that children who are looked after are provided the best possible care and safeguarding. Every member and employee have the statutory responsibility to act for those children in the same way that a good parent would act for their own child. Cardiff Council's Corporate Parenting Advisory Committee are collectively responsible for achieving this and ensuring children and young people receive the best possible care and support, that they are appropriately safeguarded and achieve the best possible chances in life. The Committee actively works to promote the life chances of looked after children in the care of Cardiff Council and those young people who are care leavers. The voice of those children and young people in care help to drive and shape the Committee agenda and priorities, this also includes monitoring services that are delivered across all statutory and voluntary sector organisations.

This report presents the Committee's main activities during 2020/21. It begins with background information that is helpful in understanding the Committee's function, purpose, and the scale of its responsibilities. This includes:

- A record of meetings and attendance
- Terms of reference and Corporate Parenting protocol
- Young Person Participation
- Activity of the Committee
- The Corporate Parenting Strategy
- Monitoring Performance

### **What does it mean to be a Corporate Parent?**

“When a child or young person enters the care of the Council, the role of being a parent is taken on by the local authority. This is known as Corporate Parenting. The term describes how Cardiff Council collectively fulfil their parenting responsibilities, by seeking positive outcomes for children looked after and young adults who are care leavers in the same way we do for our own children. From early years into



adulthood all our children, young people and young adults should be kept safe, are happy and have every opportunity to thrive. Leadership & influence Effective Corporate Parenting requires not only strong collective ownership and leadership but influence at the most senior level” (**Cardiff Corporate Parenting Strategy 2021-2024**)

### **Who are the Committee?**

The Cardiff Corporate Parenting Advisory Committee brings together strategic partners to work with elected Councillors to improve outcomes for looked after children and young people and care leavers. The Committee’s values highlight the right results can only be achieved by all professionals working together and listening to children and young people to understand what matters to them.

### **Record of meetings and attendance**

During the 2020/21 municipal year 6 Committee meetings were held. An additional meeting with the Chair of CPAC and Bright Sparks group was held on the October 29th

The scheduled meetings were held on:

- 17th November 2020
- 9th March 2021
- 18th May 2021
- 20th July 2021
- 19th October 2021
- 18th January 2022

### **Membership**

Membership of the Committee is approved by Council at its Annual Meeting each year. Seats are allocated on a politically proportionate basis. The Committee is chaired by

the Deputy Leader of the Council. There were three changes of individual membership during the 2021/22 term. During 2021/22 members of the Committee were as follows:

<b>COUNCILLOR REPRESENTATIVE</b>		<b>ATTENDANCE</b>	
		<b>Meetings: Possible</b>	<b>Meetings: Actual</b>
Sarah Merry (Chair)	Labour (Deputy Leader, Cabinet Member for Education, Employment and Skills)	6	6
Cllr Sue Lent	Labour	6	6
Cllr Thomas Parkhill	Conservative	6	2
Cllr Shaun Jenkins	Conservative	6	4
Cllr Mike Jones – Pritchard (from 25.11.21)	Conservative	1	1
Cllr Lisa Ford (from 25.11.21)	Propel	1	0
Cllr Fenella Bowden (until 29.09.21)	Independent	4	2
Cllr Graham Hinchey	Labour (Cabinet Member for Children & Families)	6	5
Cllr Dan Naughton	Liberal Democrats	6	6
Cllr Ashley Lister	Labour	6	1

Meetings were also attended by a core group of senior managers from Children's Services, Education , Cardiff and Vale University Health Board and NYAS Cymru. They attended in the capacity of advisors to respond to questions. Invited guest speakers also presented to the Committee. Further information is provided on those discussions in the following section of this report.

Due to a change in operating model to focus on the challenges raised by the global pandemic 2 Committee meetings were cancelled in the municipal period in 2020. The further 2 Committee meetings that took place in November 2020 and March 2021 are included in the report.

## **Young People Participation**

The National Youth Advocacy Service (NYAS) are commissioned by Cardiff Children's Services to deliver a participation service called the Bright Sparks group to children and young people aged 11-25 needing care and support. The principal objective is to ensure children and young people are afforded a voice, becoming active participants in shaping policy and service provision within the council and within a wider external context.

In addition, Bright Sparks is a peer support forum for care experienced children and young people, providing them with opportunities to take part in social activities, other participation opportunities and avenues of support.

At each Committee meeting the Participation Officer from NYAS Cymru attends to inform the Committee of work undertaken by members of the Bright Sparks group in line with the Priorities in the Corporate Parenting Strategy. The updates also provide feedback from young people in order to strengthen the voice of young people and inform the Committee of the challenges, achievements and views of care experienced young people in Cardiff.

## **Engagement Session with Bright Sparks Group**

The Chair of the Corporate Parenting Advisory Committee met with members of the Bright Sparks group via an engagement session at a local venue. The purpose of the session was for members of the Bright Sparks group to find out more about the role of the Committee and role of the Chair. The session also helped the Chair of the Committee understand the issues directly impacting young people.

A series of ice breaker activities were held which included a question-and-answer session and an exhibition of a photography project that members of the Bright Sparks group took part in. The session also provided an opportunity for young people and the chair to have an open discussion about their experiences and provide feedback on the Corporate Parenting Strategy.

Feedback from young people who took part in the engagement session:

***“I’m glad that I came today – I got my point across and got to explain what it is like for us. I would like to do that again; it is important that they listen”***

***“It was very interesting and good to speak directly instead of through a Social Worker or Advocate”***

The themes identified in the engagement session were presented to the January 2022 Committee meeting. This included:

- Access to mental health services
- Stigma
- Cost of living

This feedback will inform projects developed with partners, young people and the Corporate Parenting Operational group.

## **Corporate Parenting Advisory Committee new Terms of Reference**

In May 2021 the revised Terms of Reference of the Corporate Parenting Advisory Committee and Corporate Parenting Protocol were agreed by the Committee, and approved by Council at its Annual Meeting in May 2021

### **Terms of reference for the Corporate Parenting Advisory Committee:**

The terms of reference for the Committee can be found [here](#)

## **Corporate Parenting Protocol**

An independent expert facilitated a series of discussions with Cabinet Members, Group Leaders, Scrutiny Committee Chairs and offered workshops for all Elected Members to enable them to have their views considered as part of the development of a Corporate Parenting Protocol.

In May 2021 the Head of Democratic Services presented the Corporate Parenting Protocol to obtain feedback and views from the Committee.

The link to the Corporate Parenting Protocol can be found [here](#)

The Protocol was agreed by the Committee and approved by Council at its Annual meeting in May 2021.

## **Corporate Parenting Strategy**

The Corporate Parenting Strategy is a three-year multi agency strategy that sets out what Cardiff Council and other organisations need to do as corporate parents to enable Children Looked After and Care Leavers to thrive. The Corporate Parenting

strategy outlines five key priorities based on the views and experiences of Looked After Children in Cardiff.

The five priorities identified by our young people were:

**Priority 1: Improving emotional well-being and physical health**

**Priority 2: Better connections, improved relationships**

**Priority 3: A comfortable safe stable home whilst in care and after**

**Priority 4: Educational achievement, employment, and training**

**Priority 5: Celebrating our children and young people**

The Cardiff Corporate Parenting Strategy 2021- 2024 can be found [here](#):

Committee members were involved from the outset in the development of strategy, providing useful and valuable insight and feedback.

The Corporate Parenting Advisory Committee considered the draft Strategy at its meeting on 9th March 2021 and recommended the draft Strategy should be submitted to Cabinet for approval. The Corporate Parenting Strategy was agreed by Cabinet in March 2021.

## **November 2020**

In November 2020 the Committee approved the previous Committee Annual report and approved the work programme of activity for the year. Members of the Committee also received the following updates:

### **Member Protocol on Safeguarding Vulnerable Children and Adults**

In November 2020 members of the Committee considered a revised draft of a Member Protocol which provided guidance and advice to Elected Members on their roles and responsibilities in relation to safeguarding vulnerable children and adults.

The Director of Governance and Legal Services and an independent consultant informed the Committee of the work that had been undertaken to develop the protocol. This included incorporating flowcharts to clarify the process for members to make a safeguarding referral or to raise other safeguarding concerns and extensive discussion with members to ensure it remained fit for purpose.

The Committee were advised that the document had been considered by the Standards and Ethics Committee and also the Children and Young people Scrutiny Committee. Members of the Committee were informed that the protocol would go to Cabinet and then the Council for adoption, considering any views received.

A discussion was held with Committee members about the content of the protocol with particular reference to wording. Members of the Committee were encouraged by the work that had taken place and were felt that Cardiff was setting a bar that others will follow. Committee members considered it was helpful to have clarity on their role as advocates; bringing issues to Officers who are professionals, to deal with them.

### **Young Person Participation**

In November 2020 the Committee were updated about the mechanisms used to seek the views, concerns and issues facing looked after children throughout Cardiff. Committee members were also informed of the development and progression of projects across the service area to help enhance the voice of young people which included a new digital app and building on the Bright Sparks Participation forum.

A discussion took place about how young people were able to engage with the Committee in the future. The Committee were intrigued about the mutual participation between young people, their forum and CPAC, but sought advice on the format in which the young people would like this to take place. Members of the Committee suggested that when meeting face to face they could meet somewhere familiar to the young people.

Committee members wished to stress to young people that that they were keen to hear from them and it would be an opportunity for them to raise any issues and would

be positive all around. They were keen that this experience was not intimidating for the young people.

## **March 2021**

### **Family Thrive project**

In March 2021 the Project Manager for the Family Thrive Team presented to Committee courses for parents and carers being piloted by the Looked After Children in Education (LACE) Team. The purpose of the course was to support parents and carers to meet the wellbeing and social emotional development needs of their children. Topics included brain development, activities to develop our stress-regulation system, the importance of creativity and play, understanding behaviour as communication and ideas on how to calm ourselves and our children. Members of the Committee were also informed of the schools who displayed an interest in running the course and feedback obtained once the course was completed.

### **Personal Adviser Service Update**

In March 2021 the Team Manager for the Personal Adviser Service updated the Committee on the work that had been undertaken to support young people leaving care, including during the Covid 19 pandemic.

The Committee were informed of the key functions of the Personal Adviser service which included:

- Providing advice and guidance for young people aged 16- 25 leaving care.
- Participate in the assessment, preparation, implementation, and review of Pathway Plans as well as to coordinate the provision of services to young people and take reasonable steps to ensure young people make use of services that could meet their needs.



- Act as an advocate for young people and support their engagement with other advocacy services to ensure their voices are heard and responded to accordingly

The Committee were advised of the issues that had impacted the service during the Covid 19 pandemic and how it had adapted in line with government restrictions at the time. This included maintaining contact with all young people open to the Personal Adviser service and providing advice via telephone, skype and text. Members of the Committee heard how staff were working flexibly to ensure the needs of young people were prioritised to support them at times when they may feel more vulnerable and isolated.

A discussion was held on the emotional drain the pandemic and restrictions had on young people and officers were questioned if they felt they provided the supportive role that parents would. The Committee were advised that young people often have many different support workers throughout their lives and building relationships was vital. The nature of working relationships varied also with some young people having aspirations and ideas for their future, some young people coming from the Youth Justice Service, others in crisis. Each young person needs different levels and types of support at different times. Members of the Committee commended the work by Officers.

### **Bright Sparks Participation Update**

The Participation Officer for National Youth Advocacy Service (NYAS) attended the Committee to provide an update of the annual Bright Sparks event which celebrates the achievements of care experienced young people in Cardiff.

The Committee were informed that the event celebrates the numerous achievements of care experienced children and young people in Cardiff, whilst also acknowledging the commitment and dedication of others such as social workers, foster carers and supported lodgings providers. The event is the annual highlight of the Bright Sparks group, with young people playing a fundamental role in its planning and organising.

The event has been an excellent example of good practice in participation. Due to the Covid 19 restrictions the event last year was held online.

A discussion was held in regard to planning for future Bright Sparks event including suggestions from Committee members about a change in categories, the best time in the year for the event to take place and where would be best to hold the event. Members of the Committee were advised that the suggestions would be fed back to the young people for consideration.

### **Forward Work Plan**

Following agreement from members of the Committee the Forward Work programme and meetings held from May 2021 to January 2022 were based around the priorities outlined in the Corporate Parenting Strategy.

## **Priority 1: Improving emotional well-being and physical health**

In May 2021 the Committee received a number of updates from organisations and services that help to support and improve the emotional well-being and physical health of care experienced young people in Cardiff in line with priority 1.

### **Resilience project**

The Resilience Project Practitioner presented an update to the Committee on the work that had been undertaken by the Resilience project over an 18-month period. The Committee were advised that the aims of the project focused on building greater capacity, expertise and mental health resilience for children and young people in educational settings across Cardiff and the Vale.

Members of the Committee were advised of the close partnership work of the project with partners such as CAMHS, third sector services and youth services. Committee members noted the importance of smooth and timely transition between different interventions. Members of the Committee were informed that direct intervention work

is led by Developmental Psychotherapists with the involvement of teachers, with a focus on supporting parents with practices including therapeutic parenting, particularly if there has been a trauma in the child's early life that might impact on their development.

The Committee were informed of different models and strategies that are used to support young people such as:

- PACE- Playfulness, Acceptance, Curiosity, Empathy
- Regulation strategies
- Anxiety management
- Cognitive Behaviour Therapy
- Dialectical Behaviour Therapy
- 

The Committee were advised that the project is expanding into 3-4 schools every half term and that staff have been identified for training. The project facilitates the 1st round, and it is then expected that the staff will continue with further rounds to build resilience in that school.

### **Regional Health and Social Care Partnership**

In May members of the Committee were provided with a detailed presentation from the Director of Health and Social Care Integration on the newly established Starting Well Partnership and the revised governance arrangements of the Regional Partnership Board.

The Committee were informed how the partnership brings together two major programmes, together with previous work and projects. Members of the Committee were informed of the goal to improve the impact of the Regional Partnership Board and joining up of services to wrap around the needs of both children and their families. Committee members discussed the work of the Regional Partnership Board and noted that the work was considered was very complex and discussed the need for it to be finessed.

## **Bright Sparks Participation update**

The Participation Officer from NYAS Cymru updated the Committee of the work that had been undertaken by members of the Bright Sparks group addressing priority 1 of the Corporate Parenting Strategy.

The Committee were informed of how the Bright Sparks group developed resources that explored the lives of care experienced young people, what wellbeing means to them and how their dreams and aspirations have been shaped through their experiences over time. These resources were used as part of the Fostering Network well-being classes delivered to foster carers and professionals . Other work updates provided to the Committee included:

- Development of resources for care experienced young people working with Cardiff University.
- Participation in consultation on young peoples' views and thoughts on statutory school and community counselling services.
- Bright Sparks group attendance to mental health and wellbeing workshops on Resilience.

Children and young people reported that they were being overly consulted due to a duplication in surveys from different partners. The Committee considered how this could be addressed by increased partnership between organisations. Young people also need to feel the information they supply is important and the benefit and impact of surveys explained.

## **Assessment and Therapy Pilot**

The Commissioning Manager for Children Services provided members with an overview of progress on an Assessment and Therapy Pilot. The Committee were informed that the pilot focused on conducting gap analysis, quality assurance and market engagement to identify commissioning needs and possibilities.

Members of the Committee were provided with a Therapy Pathway which was developed to reduce duplication for Social Work teams and provide an efficient process where therapy is identified as a requirement for a child or young person. The Pathway had been enhanced to align with the ENFYS service to ensure that the provision of therapy was consistently considered and consulted on in conjunction with Health Board colleagues and expertise.

Committee members were advised in relation to outcomes of the pilot that within 6 months the pilot would have a handle on the data and the process would be fully embedded and aligned with the Health Board and that within 18 months it would be possible to report back on the themes coming through from the data.

## **Priority 2: Better connections, improved relationships**

In July 2021, in line with Priority 2 of the Corporate Parenting Strategy, the Committee received a number of updates about services and developments that are aimed to improve the working relationships between young people and professionals, as well as an update on the impact Covid 19 pandemic has had on services. Updates provided in July also focused on the work that had been undertaken by services as part of a - COVID recovery plan.

### **Enfys Service**

Enfys is an NHS-based service for children and young people looked after, adopted or on the edge of care in Cardiff and the Vale. In July Consultant practitioners from Enfys provided the Committee with an update on their work. Members of the Committee were informed that the number of children becoming looked after has increased during the pandemic. In addition, many of the children and families supported by Enfys are in crisis. Increasingly the service is seeing a need to support children still residing with their birth families.

A discussion was held about the behaviours presented to the team which included aggression, withdrawing, self-harming, depression, and anxiety. The Committee were

informed how Enfys works closely with CAMHS to provide wraparound support in order to upskill adults to better understand young people's behaviour. The Committee were advised how the service was funded and a discussion took place around funding contributions and the including sustainability of the service.

### **Voices from Care Cymru – Welsh Government review of Corporate Parenting**

Voices from Care Cymru is a third sector organisation which aims to improve the lives of care experienced children and young people in Wales by being an independent voice for the care community. In July the Programme Manager provided an update to the Committee on the organisation's involvement in the Welsh Government's Review of Corporate Parenting.

Committee members were advised that the Welsh Government would be embarking on an extensive programme of work and engagement activity to take forward a new 'refreshed' approach to corporate parenting. The Programme Manager informed the Committee that the new approach would look at doing things differently whilst other elements would focus on strengthening what is already in place by raising awareness and increasing knowledge about organisations' roles and responsibilities.

The Committee were reminded of the forthcoming operational group looking at Corporate Parenting Strategy and investigations were underway to see how the efforts of different bodies could be linked to avoid duplication. Members of the Committee were advised of how Voices from Care Cymru will produce a Corporate Parenting Charter to enable stakeholders to sign up to a common statement of improved support and action when working with care experienced children.

Committee members enquired as to the responses from local authorities across Wales to the Corporate Parenting Charter and were informed that responses were similar and there was a widespread recognition that an extension of duties were needed.

## **Mind of my Own Project**

The Mind of My Own digital app help children and young people express themselves freely and communicate with their social worker and other professionals. The app has been designed and co-produced with young people for young people and unlike traditional surveys, the apps allow staff to receive organic and authentic feedback from the children and young people using services.

The Account Manager from Mind of My Own and the Corporate Parenting Officer attended the Committee to share information to Committee members of how the Mind of My Own app had been implemented across Children's Services in Cardiff. The Committee were informed of the two features of the app; the 'One App' which allows young people to create their own account on any device and communicate in ways which suit them, and the 'Express App' for young children and those with communication needs, this can only be accessed through a workers account.

The Committee were informed that when a child or young person has used either of the apps to share their views a clear statement is created which is automatically sent via a service portal. This is monitored and sent to the social worker.

The Committee were informed that training to staff had been adapted to be delivered online rather than face to face due to Covid restrictions. Members of the Committee were advised that around 100 languages are available on the app and that the data collated was only visible to the local authority client and not the company.

## **Vale, Valleys and Cardiff Adoption Collaborative Performance Report 2020- 21**

An Operational Manager for Children's Services attended the Committee in July 2021 to inform Committee members of the progress made under the Vale, Valleys and Cardiff (VVC) Regional Adoption Collaboration. The Committee were informed that adoption services had performed well given the adaptations that had been necessary during the Covid-19 pandemic and were provided figures for the number of children referred to services, orders made, children successfully placed, children adopted, and children matched who had significant complex needs. Members of the Committee were informed that 45% were able to secure orders within 6 months of a court order

and that there had been a year on-year increase in the number of adopter enquiries and adoption approvals. Adoption support services had significantly increased along with complex care packages.

### **Bright Sparks Participation Update**

The Participation Officer from NYAS Cymru attended to inform the Committee of activities of the Bright Sparks Club in relation to priority 2 of the Corporate Parenting Strategy. The 'What's Your Story' project was shared, it aims to challenge media stereotypes and stigmatisation of children and young people in care and will be on the NYAS website later in the year.

Committee members were informed that of a number of other projects and work members of the Bright Sparks group have been involved in which included:

- A review into the recruitment of volunteers to the Independent Visitor Project
- Involvement in new developments regarding Advocacy work in Cardiff and ensuring that NYAS complies with RISCA (The Regulation and Inspection of Social Care (Wales) Act 2016)
- Providing feedback on the draft Cardiff Anti-Bullying Guidance has been provided to the Child Friendly Cardiff Team

Members of the Committee stated that they were pleased to hear that young people were becoming more interested and involved in politics and noted that there is a forthcoming public event during Democracy Week in October which will examine the role and responsibilities of Councillors.

Members of the Committee noted that Julie Morgan MS was being invited to talk to young people about their experience of elections and asked if, in the interest of political balance, members of opposition parties could be invited too. Participation Officer advised Committee members that members of opposition parties were intended to be invited also.



## **Delivering a Child Friendly Recovery**

The Operational Manager for Partnerships and Performance along with the Achievement leader attended the Committee in July 2021 to provide an update on a recent Cabinet report entitled 'Recovery & Renewal: Delivering a Child Friendly Recovery' of 20th May 2021.

Discussions were held about attempts to engage with Children Looked After regarding summer activities. Children who were looked after and other vulnerable children were given priority access to these events and there was extensive engagement through the Youth Service website and social media. The Summer of Smiles festival, the Youth Service summer programme through Youth Centres, Roadshow events and a pop-up youth provision were provided. Youth mentors supported Year 11s at risk of disengagement. The Committee were advised that capacity was added into the pre-16 Children Looked After education team to ensure additional mentoring capacity. Teams were being joined up across Education, Children's Services and People and Communities to engage in a life coaching programme entitled Compass for Life.

## **Priority 3: A comfortable safe stable home whilst in care and after**

In October 2021 members of the Committee received a number of updates from a wide variety of services that helped to achieve Priority 3 of the Corporate Parenting Strategy: helping to provide a comfortable, safe, and stable home for young people in care and after.

### **Young Person Gateway**

The Housing Accommodation Manager attended the Committee to provide information of the Young Person Gateway (YPG); an Accommodation provision for young people aged 16-21. This included information in regard to the current structure of the service, data on outcomes and information around the expansion plans for the Gateway.

The Committee were informed what happens when a young person presents as homeless and the support that is provided in supported accommodation for example developing independent living skills. Members of the Committee were also advised that when a young person has been identified as being ready to live independently, they will be required to attend a training session which covers all the necessary information around managing a tenancy, such as; connecting utilities, how to pay rent, applying for any benefits, how to register with a GP and managing relationships with neighbour. Information was provided on the development of the service and plans in place to strengthen support for young people.

### **Foster Wales Launch**

In October 2021 the Regional Marketing Officer from Foster Wales presented to the Committee on the launch of a national partnership of local authority fostering services. Members of the Committee were informed of the challenge in recruiting foster carers across Wales via a presentation which also included the national campaign to promote the work of Foster Wales and support recruitment.

Discussions were held amongst the Committee and members of the Committee sought clarification on whether there had been any specific targeting in the social media campaign and if there were plans to produce publicity material in other community languages besides English and Welsh. The Committee were informed that the campaign had been generic, on a national level and marketing had been aimed at raising awareness on a broad level. Committee members were advised that as the campaign progresses more work will be undertaken on identifying specific opportunities for targeting. The Committee sought information on the percentage of foster carers from BAME backgrounds. Members of the Committee were advised that the precise figures were not available, but the percentage was understood to be low.

### **Bright Sparks Participation Update**

The Participation Worker from NYAS Cymru updated the Committee on the Bright Sparks Club and the activities the group had undertaken in relation to the third of the 5 Priorities.

The All-Wales National Steering Group were undertaking work on a children's rights approach to policing and the Bright Sparks members provided initial thoughts on this. Members of the group had provided feedback to the use of language used regarding "Return interview or Debriefs" and had informed the steering group that the language used was too formal and not young person friendly.

The Committee were also informed that NYAS had been successful in their application to be a partner organisation at Welsh Youth Parliament. Members of the group were consulted on how they feel the NYAS representative in the parliament should be elected and that children and young people will be supported to apply for the role.

A discussion was held on whether Children and Young People were provided with information on local elections. The Committee were advised that there had been sessions on the Senedd earlier in the year and young people were supported in registering to vote. Information has also been shared about the Youth Parliament.

Members of the Committee enquired on links with higher and further education. They were informed discussions were planned about opportunities for care experienced young people to attend university. Links were being made with First Campus; a collaboration between Cardiff Met, Cardiff University and University of South Wales. A First Campus outreach manager has recently been appointed and is looking at developing pathways for care experienced young people to enter university.

### **National Transfer Scheme**

In October 2021 the Operational Manager and Project Manager presented a report informing the Committee of the National Transfer Scheme along with an update on the developments of its implementation. Committee members were informed of the long-term objective of the voluntary transfer scheme which was to ensure that children can access the services they need by achieving a fairer distribution of unaccompanied children across all local authorities and parts of the UK, through a scheme which is equitable and transparent.

The Committee were informed that each region or nation involved in the scheme takes its turn on the rota in sequence with the expectation being for that region or nation to fulfil the allocated number of placements at which point responsibility will move on to the next region. A discussion was held on the frequency and duration of periods on the rota and the Committee were informed that the pressures on the service meant that the rota cycle had gone round more quickly than initially anticipated. It had been said that there would be a pause for reflection when the regional commitment of 20 young people in Cardiff and 30 across the region had been reached.

Committee members queried whether the National Youth Advocacy Service ( NYAS) could support. Officers advised that there had been contact with National Youth Advocacy Service and that Advocacy can be involved in 2 ways; supporting young people on arrival including those needing an age assessment, and those entitled to the active offer. Members of the Committee noted the update of the scheme

### **Independent Reviewing Officer Monitoring Report**

In October 2021 the Service Manager for Children Services IRO team provided an update to the Committee on key updates and trends on Children Looked After during the last period. Members of the Committee were informed of the role of the Independent Reviewing Officer and legal requirements. Service information was provided including how Looked After Children reviews have been adapted in line with Covid 19 restrictions. Key information was provided on the demographics of Children Looked After in Cardiff as well education arrangements.

A discussion was held as to whether there was evidence of more children coming into care due to the lockdown and the consequent pressure on families. Committee members were advised that there had been a large increase in the number of children on the Child Protection Register during the lockdown and that there were a number of reasons for the rise. Committee members were informed that work was being undertaken to ensure children were receiving the right services and there was the right level of scrutiny, it was noted that reviewing will be extended to children on the Care and Support plan.

## **Priority 4: Educational achievement, employment and training**

In January 2022 members of the Committee received a number of updates from a wide variety of services that helped to achieve Priority 4 of the Corporate Parenting Strategy: Educational achievement, employment, and training.

### **Into work Advice Service**

The Bright Futures Project provides support for Care Experienced young people (16-24) who are identified as Not in Education, Employment or Training (NEET) and needing intensive help to access training and the workplace. A team of five Youth Mentors liaise with partners in Children's Services and Youth Services to ensure that all Care Experienced young people are given the opportunity to reach their potential and be supported into education and work. The Assistant Into Work Coordinator for Youth and Bright Start Youth Employment Mentor presented an update to the Committee on the Bright Futures Project and Bright Start Traineeship Scheme.

A discussion took place in regard to placements offered by external agencies. The Committee were informed that due to concerns around covid 19, external placements were put on hold and that placements have been taking place internally within Council departments. Members of the Committee expressed disappointment that it had only been possible to make internal placements and noted the importance of widening placement opportunities when Covid restrictions allow. Committee members discussed the benefits of face-to-face meetings with young people on placements and commended the work of officers in supporting young people.

### **Bright Sparks Participation Update**

In January 2022 the Committee were informed of the activities that the Bright Sparks group had undertaken in relation to the fourth of the five Priorities in the Corporate Parenting Strategy, as well as details of an engagement session held with members of the Bright Sparks group and Chair of the Committee.

The Committee were informed of the themes following the discussions that took place with young people and the next steps services and partners would take to deliver change as a result of what members of the group had said. This included an example of tackling stigma faced by care experienced young people. Officers advised that the care experienced young people that they worked with were proud of their experience as Children Looked After and working with others who fall into that category is important to them.

Members of the Committee expressed the importance of peer support for young people to achieve their aspirations.

### **Support for Care Leavers**

The Personal Adviser service manager and well-being coordinator updated Committee members of the work undertaken to support young people leaving care, as well as future plans for the service. A presentation highlighted activities that had taken place as part of Care Leavers week including a residential trip and DIY sessions with a local construction company.

A discussion took place about further activities that could take place to support the well-being of Care Leavers. The view was expressed that it was the activities that young people wished to do that mattered. Life skills such as cooking, DIY and financial awareness are important to enable young people to live independently. Sessions given by the team are intended to give young people more independence and confidence that will enable them to join outside groups such as Scouts building on their social skills and other opportunities.

### **Youth Justice Service update**

In January 2022 the Operational manager from the Youth Justice Service presented to the Committee on data and information on Children Looked After who are supported by the service. Information was provided on the background to the service which included legislation, structure of the service and the support provided to young people.

A breakdown of data was provided in reference to the number of young people known to the service who Children Looked After.

Members of the Committee enquired as to the nature of preventative work undertaken with children aged 8-9. Officers advised that while some areas did conduct prevention work among 8–9-year-olds HMIP had advised that this was not appropriate for Youth Justice Service. There might be scope for targeted work within primary schools which the service could contribute to.

Committee members were informed of substance misuse workshops; the Committee were informed that the workshops were targeted according to the needs of the different residential establishments and that substance misuse workers provide information and support to children in reducing harmful behaviours and making positive choices.

Members of the Committee enquired whether substance misuse workshops would take place. The Committee were informed that the workshops would commence following recruitment.

### **Children Looked After in Education Annual Review Briefing**

The Achievement Leader for Key Groups and Project manager from the Looked After Children Education Team attended the Committee and provided an overview of the results of tracking and monitoring the performance of Looked After Children in Education. Members of the Committee were informed of the positive feedback provided by Estyn following the work that taken place to support Looked After Children during the pandemic. The Committee were informed about the key performance of young people in education in Cardiff, what was working well within the team and the further actions needed for improvements to be made.

Committee members discussed whether it would be appropriate to incorporate targets for exclusion rates, transition to GCSE, and progression to employment, education, or training. Officers advised that the aspiration was for no children to be excluded and all children to progress to employment, education, or training and that it is important to consider what success means for an individual.

Further discussion took place in regard to the distances travelled by Looked After Children educated in out of county settings. Officers advised that even where the settings were just over the border, they still presented difficulties.

## **Additional learning Needs and Education Tribunal Wales Act 2018 Update Briefing**

Officers from the Looked After Children Education team provided a presentation on the Additional Learning Needs and Education Tribunal (Wales) Act 2018 and the new responsibilities outlined in the act. The Committee were informed of the main principles as well as information that all Children Looked After with Additional Learning Needs would have a Local Authority maintained Individual Development Plans and information about what the Individual Development plan would contain.

Members of the Committee sought clarification on where responsibility for a child's IDP would lie. Officers advised that the Local Authority would be responsible for the IDP, and it would rest upon colleagues in Children's Services and Education to ensure a joined-up approach. The sole focus of the inclusion teacher is the IDPs. Committee members welcomed the inclusion of Looked After Children in the development of their IDPs and discussed how the experience of Children Looked After by the Local Authority and those who were not differed.

## **Monitoring Performance**

The terms of reference for the Committee require the Committee to regularly review performance data and ensure performance monitoring systems are in place to achieve sustained improvements. A number of developments have been made to help capture data and inform the Committee of key services that help to achieve deliverable outcomes to improve the lives of Children Looked After and Care leavers.



## **Key Performance Indicator dashboard**

A Key Performance Indicator Dashboard was agreed by the Committee to help monitor and understand the services that support Children Looked After and Care Leavers. Previously the Committee had received a number of Key Performance Indicators from predominately Children Services and the Education Directorate, however Children Looked After and Care Leavers have support and involvement from a range of services and agencies and therefore the dashboard was developed to help capture data more widely.

The Key Performance Indicator Dashboard is now a standing performance management item on the Committees agenda and shows a range of key data from internal departments and outside agencies that have an impact on the lives of Children Looked After and Care Leavers in Cardiff.

Partners who contribute and provide key performance indicators include:

- Cardiff and Vale Health Board
- Children Services
- Bright Futures
- Housing Directorate
- Education Directorate
- Criminal Justice System
- Adolescent/ leaving care services

The dashboard continues to be developed to help include relevant data will help members of the Committee in their role. Performance information training will be added to the Member Development programme to help Committee members to learn and to develop their ability to analyse performance information.

## Corporate Parenting Strategy Progress Report

The Corporate Parenting Officer for Children Services presented an update to members of the Committee on the implementation of the new Corporate Parenting Strategy. Committee Members were informed of the progress made and outcomes and developments in the first 6 months of the strategy being implemented.

The report provided a number of projects from a range of partners that had taken place to improve the lives of care experienced young people over the first 6 months in line with each of the 5 priorities of the strategy and the plans for the future

Progress that had been reported to the Committee included:

- **Private Sector Opportunities** – DIY sessions to support those leaving Care were held to help young people learn skills such as decorating and basic home repair helping to prepare with independent living.
- **Summer of Smiles Festival** – Care experienced young people were provided with exclusive access to book onto activities as part of the 6-week summer programme
- **Independence planning workshops** – pilot of Children's Services and housing to improve independence planning. The workshop took place to inform staff and stakeholders about how to plan for independence for young people leaving care. Care leavers shared their experiences and informed staff of the challenges they faced moving to live independently.

Information was shared on the development of the strategy and the systems put in place to galvanise internal and external agencies to have a role to play in extending Corporate Parenting duties. This included the establishment of an operational group and development of a shared multi agency action plan.

Committee members noted the report and advised that there had been significant progress in the work over recent months.

## **Corporate Parenting Strategy Action Plan**

The Corporate Parenting Strategy action plan outlines key deliverable outcomes that aim to improve the lives of care experienced young people in Cardiff.

The Committee were informed of the development of the action plan and the establishment of a multi-agency Operational group and membership of the group which included representation from:

- Children Services
- Housing
- DWP
- Child Friendly City Team
- Education
- Youth Service
- Police
- Cardiff Commitment
- HR
- Tourism & Leisure
- Voices from Care Cymru
- NYAS Cymru

Members of the Committee were informed that the action plan for the Operational group outlined a set of key clear deliverable outcomes that help to improve the lives of care experienced young people in Cardiff. Members of the group provide updates to the progress made against the actions.

## **Complaints and Compliments – Performance Report**

The Committee's terms of reference state that it will receive Children's Services Complaints reports and Compliments performance report. A report is produced and provided to the Committee at each reporting quarter period.

It is a statutory requirement for Local Authorities to have in place a Representations and Complaints Procedure for Social Services. Statutory complaints relate to the provision of social care and are handled in line with the national regulations. Citizens making complaints have a right to be listened to properly and have their concerns resolved quickly and effectively. Children's Services emphasis is on listening to concerns and using this learning to improve services for everyone who uses them. Complaints should be handled in such a way that the complainant is the focus, not the process, and that the particular circumstances of the complainant are considered (including their age or disability). Where the complaint relates to a looked after child, a child in need or a care leaver the local authority has a duty to provide an advocate as required.

At each quarterly report update the Committee were informed of the methods of how citizens can make a complaint, the themes of the complaints with analysis, as well as compliments received about Children Services, thus helping the Committee to gain an understanding of common issues facing citizens.

### **Quality of Care Review**

The Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017, (amended 2019) provides the requirement of a Quality-of-Care Review. In October the Committee received the Annual Quality Assurance Report for Ty Storrie Short Break Service and Crossland's Childrens home covering the period Oct 2020 – March 2021. The aim of producing the reports was to inform and drive improvements in the quality of care provided to the young at the home and short break service.

The reports outlined the results and feedback from a number of surveys conducted which included young people's feedback, staff, social workers, and parents. The Operational Manager for Performance, Strategy and Resource presented to the Committee key findings and a summary of both Quality-of-Care reviews which included examples of good practice, outstanding actions from previous reviews and how young people are supported to have their voice heard.

## **CONCLUSION**

During 2020/2021 Committee members received a wide range of updates and information from a variety of organisations and teams helping the Committee gain an understanding of the issues impacting Care experienced young people and the organisations, projects and initiatives that support them.

These updates helped to notify the Committee of how services and organisations adapted to the Covid 19 pandemic and the future plans and developments for services Areas of particular interest from Committee members for 2020/2021 were:

- Participation of Children and young people updates
- Voices from Care presentation
- Launch of Foster Wales

Key systems were put in place to support Committee members in their role including a refreshed Terms of Reference, Corporate Parenting Protocol and the development of a Key Performance Indicator dashboard.

The forward work programme for the Committee had been shaped to link with the new Corporate Parenting Strategy and connections between young people, external and internal partners were strengthened.

Mae'r dudalen hon yn wag yn fwriadol

**CABINET MEETING: 28 SEPTEMBER 2022**

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**HIV ACTION PLAN FOR WALES; ELIMINATING HIV –  
IMPROVING QUALITY OF LIFE AND TACKLING STIGMA  
ASSOCIATED WITH THE VIRUS – A CONSULTATION  
RESPONSE****TACKLING POVERTY, EQUALITY & PUBLIC HEALTH  
(COUNCILLOR JULIE SANGHANI/COUNCILLOR PETER  
BRADBURY)****AGENDA ITEM: 11**

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**Reason for this Report**

1. To seek approval for consultation response to Welsh Government's Draft HIV Action Plan for Wales. The Action Plan is at Appendix 1 and the draft consultation response is at Appendix 2.

**Background**

2. When HIV first began infecting people in the 1970s, scientists were unaware of its existence. Now, more than 35 million people across the globe live with HIV/AIDS. Substantial progress has been made in the fight against this formerly unknown and heavily stigmatized virus. Infection rates have fallen or stabilized in many countries across the world, but there is still further progress to be made.
3. There is no cure for HIV infection. However, with increasing access to effective HIV prevention, diagnosis, treatment, and care, HIV infection has become a manageable chronic health condition, enabling people living with HIV to lead long and healthy lives.
4. HIV continues to be a medical condition that carries a great deal of stigma. Often, this is due to lack of knowledge or people making moral judgements regarding how someone has contracted HIV. People living with HIV can experience abuse, be excluded from activities that they enjoy, face difficulties in their personal and work life. They can also become socially isolated.

5. Increasing awareness and accessibility of testing is crucial in order to diagnose HIV at an early stage, provide people with treatment and support quickly, as well as preventing ongoing transmission.

### **Global Ambition**

6. In 2000, at the United Nations General Assembly's Millennium Summit world leaders set specific goals to stop and reverse the spread of HIV. A Declaration of Commitment on HIV/AIDS was issued, which set out a series of targets and global actions.
7. Ending AIDS by 2030 is an integral part of the Sustainable Development Goals (SDGs), which were unanimously adopted by United Nations Member States in 2015.

### **Wales Context**

8. It is estimated that between 11% and 18% of people living with HIV in Wales are currently unaware that they have the infection, contributing to ongoing transmission to others in the population and poorer health outcomes for themselves.
9. The Welsh Government working with other partners has made progress in improving access to testing and treatment e.g. Pre-Exposure Prophylaxis (PrEP). PrEP is a HIV prevention strategy in which HIV-negative people use HIV antiretrovirals to reduce their risk of becoming infected with HIV. Since the summer of 2018 the NHS services in Wales have been able to prescribe PrEP.
10. Wales has seen a significant reduction in new diagnoses of HIV with a decrease of 75% between 2012 and 2021 but there is more to be done if the goal of eliminating HIV related discrimination and zero new transmissions by 2030 is to be achieved.
11. Welsh Government's Programme for Government set out a commitment to develop a HIV Action for Wales and an ambition of tackling stigma experienced by those living with HIV.

### **Cardiff Context**

12. The Fast Track Cities Initiative is a global partnership that works towards zero new infections, eliminating HIV related stigma and improving the quality of life of people living with HIV. In October 2020 the Fast Track Cardiff and the Vale Leadership Group was established consisting of senior stakeholders from Cardiff and the Vale Local Authorities, the Cardiff & the Vale University Health Board, Public Health Wales, Cardiff University, Pride Cymru, Terence Higgins Trust and other key stakeholders was created to oversee the work of Fast Track Cardiff and the Vale. Successful campaigns and projects have included testing week



and Texting for Testing which supported GPs to send HIV testing messages via text as well as links to access home testing.

13. A report from the Fast Track Cardiff and the Vale Steering Group in 2019 indicated that Cardiff has the highest HIV prevalence in Wales and at around 1000 cases is comparable to similar size UK cities that have active HIV prevention programmes.
14. The proportion of those diagnosed with HIV “late” is higher in Cardiff than the UK average, 62% in Cardiff compared to 42% in the UK as a whole. This means that more people will likely to be dependent on hospital care and more are likely to pass on their HIV to other partners, as they are not aware of their status and are receiving appropriate treatment.

### **HIV Action Plan**

15. In 2021 a HIV Action Plan Working Group led by Dr Marion Lyons, a senior Medical Officer within Welsh Government, was established. Membership of the group included a wide range of stakeholders and included Lisa Power, a member of Fast Track Cities Cardiff and the Vale Leadership Group. The group has co-created a draft HIV Action plan.
16. Consultation on the draft HIV Action Plan for Wales; Eliminating HIV – improving quality of life and tackling stigma associated with the virus – an action plan for 2023-26 was launched by the First Minister on the 14th June.

### **Summary of the action plan**

#### **Priority Areas**

17. The plan sets out five priority areas:
  - Prevention
  - Testing
  - Clinical Care
  - Living well with HIV
  - Tackling HIV-related stigma

#### **Overarching actions:**

18. The plan outlines five overarching actions:
  - Establishing Wales as a Fast Track Nation
  - Involvement of voluntary and community groups
  - Funding and development of an all-Wales sexual health case management system

- Health boards and trusts to report on the implementation of the actions in the plan
- Establishment of an Action Plan Oversight Group

### **Key Detailed Actions**

19. The Action Plan comprises of 26 actions, each linked to one of the five priority areas. The 16 actions below have potential for Local Authority involvement. Fuller details can be seen in Cardiff's consultation response to the action plan (*Appendix 2*)

- Building on the success of the Fast Track Cities initiative in Cardiff and the Vale, a new national umbrella body, Fast Track Cymru (FTC) will be established and funded by Welsh Government.
- In the implementation of the plan, Welsh Government, health boards, local authorities and other partners will work closely with the HIV voluntary and community sector.
- An HIV Action Plan Oversight Group will be established to monitor progress against the ambitions and to advise Ministers on progress and any further actions required.
- Continue to deliver, develop and evaluate the "Ask me about PrEP" programme in Wales.
- Public Health Wales, working with Fast Track Cymru collaborative networks and the voluntary and community sectors, will continue to support the wider use of, and diverse access to PrEP.
- Primary care and specialist sexual health services should develop and implement a shared care model to improve access and delivery of PrEP. Health boards should explore how community organisations can support PrEP.
- PHW will ensure that the online testing will continue to be made more accessible. The online testing will be promoted more widely by PHW to tackle inequalities and the user journey improved.
- A plan will be developed with Fast Track Cymru, health boards and voluntary & community partners to ensure no individual or community will be left behind when it comes to testing.
- The all-Wales HIV testing week will be funded appropriately by Welsh Government for the duration of this action plan. Health boards, local authorities and partners will be expected to support this initiative.

- A national peer support programme for Wales will be commissioned by Welsh Government in the autumn of 2022.
- Fast Track Cymru and its local networks working with voluntary and community groups should support health boards and local authorities to engage meaningfully with all diverse communities.
- Social Care Wales will adapt this training programme for use in the social care sector and develop a plan for its delivery to all social care workers.
- The message that people living with HIV on effective treatment can't pass it on to a partner should be promoted widely and all HIV training modules should be consistent with this message.
- Resources in the school curriculum should effectively address HIV, PrEP and stigma and be consistent with the latest evidence on HIV.
- FTC should work with collaborating organisations and the Advocacy network to ensure that awareness of stigma and the promotion of positive messages is a common and ongoing thread in their work.
- PHW, working with partner organisations and people living with HIV, will introduce and promote an annual Wellbeing Survey of People Living with HIV to monitor whether change has been affected and is effective.

## **Issues**

### **Summary of Cardiff Council's response**

20. The plan represents a comprehensive and ambitious approach to achieving the goals of eliminating HIV, improving quality of life and tackling stigma associated with the virus. A full response to the Draft HIV Action Plan has been drafted and can be found in Appendix 2. There are several areas of the action plan that have been welcomed within the response, these are set out below:

- Five overarching priority areas that set out a clear vision
- Continuation of the "Ask me about PrEP" programme in Wales.
- Option for people to access 'click and collect' services for testing
- Reaching underserved populations to ensure that no individual or community is left behind when it comes to testing.
- The extension of 'Texting for testing' throughout Wales
- Funding for the all-Wales HIV testing week

- The commissioning by Welsh Government of a national peer support programme for Wales in autumn 2022
- Support for health boards and local authorities to engage meaningfully with all diverse communities
- HIV awareness training programme for social care staff
- Resources in the school curriculum should effectively address HIV, PrEP and stigma, and be consistent with the latest evidence on HIV
- Work to increase awareness of stigma and promote positive messages
- Introduction of an annual Wellbeing Survey of People Living with HIV to monitor whether change has been affected

### **Areas for Consideration**

21. It is considered that there is scope for further involvement from local authorities in the implementation of various sections within the action plan and this view has been reflected in the consultation response (*Appendix 2*). A summary of the areas for consideration that have been included in the consultation response can be seen below:-

- Disseminating information to increase awareness within the wider community including testing and prevention programmes as well as HIV related information.
- Investigating the potential for 'click and collect' services (home tests and PrEP) to be facilitated within community venues and within targeted services e.g. homeless services.
- Involvement in the ambition for no individual or community to be left behind when it comes to testing, reaching underserved populations. Local Authorities already deliver a wide range of services to communities and could support this action.
- Wales does not currently have commissioned HIV support services. This includes a lack of dedicated HIV peer support provision. Peer support can be hugely beneficial in supporting people living with HIV to manage their condition including the impact that HIV diagnosis can have on their mental health. Welsh Government has committed to commissioning services following consideration of Cardiff Universities research around this. There is scope for possible involvement for Local Authorities in a stepped approach to facilitating support groups within the community.
- Although there is an appetite expressed within the draft plan to increase public awareness, there is no specific action around this. In order to be effective, national marketing campaigns need to be extensive and comprise a variety of platforms including digital and non-digital. This will increase the reach of the messaging. It would be beneficial for financial planning to include this aspect.

- In order to contribute to the development of compassionate communities, it may be beneficial to consider the extension of HIV awareness training detailed within the plan to additional local authority staff (as well as health and social care)
- The revised *The Curriculum for Wales – Relationships and Sexuality Education (RSE) Code* was published in January 2022. The code sets out mandatory learning for children in a phased approach beginning at the age of 3. Phase 3 (children aged 11 upwards) of the sexual health and wellbeing element of the code includes the requirement for learning to include:-

*“The knowledge and understanding of the causes, symptoms and impact of conditions connected to sexual and reproductive health and to fertility, including sexually transmitted infections, HIV and reproductive cancers. Understanding and skills needed to minimise risks and seek help.”*

It is important that schools are effectively resourced to ensure quality and evidence based learning specific to HIV can be facilitated and this action achieved

22. Cardiff is proud to have recently been successful in our application to join the World Health Organisation’s Global Network for Age-friendly Cities and Communities. Membership of the Network for every Local Authority in Wales has been set as a goal by Welsh Government (Strategy for an Ageing Nation). This collective commitment is intended to drive positive changes and developments that benefit older people. Due to the fact that people are living into older age with HIV, it would seem appropriate to have more focus within the plan specific to older people that works towards overcoming factors that risk their individual wellbeing including lack of targeted prevention programmes, isolation and the additional stigma that older people living with HIV experience.
23. In terms of the challenges to the delivery of the plan the draft consultation response stresses the importance of working together to reach underserved communities and notes the existing pressures on public services as well as the third sector and the importance of building capacity to ensure the aspirations of the plan are achieved.

## **Consultation**

24. Cardiff Council’s consultation response has been drafted following discussions and contact with Terence Higgins Trust Cymru, Cardiff University, Fast Track Cardiff and the Vale colleagues as well as Pride Cymru. Additional research has been undertaken including a review of reports undertaken by the National Aids Trust and the Terence Higgins Trust.
25. Fast Track Cardiff and the Vale held public consultation events in September.

## **Reason for Recommendation**

26. To seek Cabinet's approval of a draft consultation response to the HIV Action Plan for Wales. The aim is to contribute positively to the development of an HIV Action Plan that will effectively progress the ambition of zero transmissions of HIV and eliminate stigma for those living with HIV in Cardiff and Wales.

## **Financial Implications**

27. This report does not result directly in any additional financial implications. It sets out the background to the proposed WG HIV Action Plan for Wales and seeks approval for the Cardiff Council draft response to the related consultation document.
28. It will be necessary to ensure that any financial commitments as a result of new projects and initiatives arising from the action plan and partnership working have clearly identified resource requirements and confirmed funding sources or can be met within existing revenue budgets.

## **Legal Implications**

29. There are no direct legal implications raised by this report. However, in considering this report, regard should be had to:
- (a) the public sector duties under the Equalities Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, when making decisions, Councils must have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. Protected characteristics are a. Age; b. Gender reassignment; c. Sex; d. Race – including ethnic or national origin, colour or nationality; e. Disability; f. Pregnancy and maternity; g. Marriage and civil partnership; h. Sexual orientation; i. Religion or belief – including lack of belief; and
  - (b) the Well Being of Future Generations (Wales) Act 2015. The Well-Being of Future Generations (Wales) Act 2015 ('the Act') is about improving the social, economic, environmental and cultural well-being of Wales. The Act places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language and is globally responsible. In discharging their respective duties under the Act, each public body listed in the Act must set and published wellbeing objectives. These objectives will show how each public body will work to achieve the vision for Wales set out in the national wellbeing goals. When exercising its functions, Cabinet should consider how the proposed decision will contribute towards meeting the wellbeing objectives set by the Council and in so doing achieve the national wellbeing goals. The wellbeing duty also requires the Council

to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Cabinet must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, Cabinet must:

- a) look to the long term;
- b) focus on prevention by understanding the root causes of problems;
- c) deliver an integrated approach to achieving the 7 national well being goals;
- d) work in collaboration with others to find shared sustainable solutions; and
- e) involve people from all sections of the community in the decisions which affect them.

### **HR Implications**

30. There are no direct HR implications for this report.

### **Property Implications**

31. There are no specific property implications arising from the HIV Action Plan for Wales Report. Where there are any property transactions or valuations required to deliver any proposals, they should be done so in accordance with the Council's Asset Management process and in consultation with Strategic Estates and relevant service areas.

### **RECOMMENDATION**

Cabinet is recommended to approve the draft consultation response as set out at Appendix 2, to Welsh Government's HIV Action Plan for Wales; Eliminating HIV – improving quality of life and tackling stigma associated with the virus – an action plan for 2023-36

<b>SENIOR RESPONSIBLE OFFICER</b>	Jane Thomas Director - Adults, Housing and Communities
	22 September 2022

*The following appendices are attached:*

- Appendix 1 HIV Action Plan for Wales; Eliminating HIV – improving quality of life and tackling stigma associated with the virus*
- Appendix 2 Cardiff Council – Draft Consultation Response*

Mae'r dudalen hon yn wag yn fwriadol





Llywodraeth Cymru  
Welsh Government

# HIV Action Plan for Wales

Eliminating HIV – improving quality of life  
and tackling stigma associated with the  
virus – an action plan for 2023-26

**gov.wales**

## HIV Action Plan for Wales

### *Eliminating HIV, improving quality of life and tackling stigma associated with the virus – an action plan for 2023-26*

#### Ministerial foreword

HIV and AIDS continue to be a major global public health issue. The World Health Organisation estimates that, globally in 2020, 680,000 people died from HIV-related causes and 1.5 million people acquired HIV. Although there remains no cure for HIV, effective prevention, diagnosis, treatment, and care are now available, enabling people living with HIV to lead long and healthy lives.

Over the past five years, the Welsh Government, working with other partners, has made huge progress in improving access to testing and treatment in Wales. Wales can be proud of the significant reduction seen in new diagnoses of HIV. Between 2015 and 2021 new diagnosis of HIV decreased by 75%. A significant factor in this achievement can be attributed to the commitment by Welsh Government to provide Pre-Exposure Prophylaxis (PrEP) for all for whom it is clinically indicated since the summer of 2017.

Despite the challenges that faced sexual health services throughout the Covid pandemic, access to HIV testing was maintained through face-to-face consultations and the rapid deployment of on-line testing. As we emerge from the pandemic, this blended model of access to HIV tests has resulted in more people being tested for HIV between January and March 2022 than in any previous quarter.

Our *Programme for Government* sets out ambitious commitments to both develop an *HIV Action Plan for Wales* and tackle the stigma experienced by those living with HIV. The latter is especially significant. We have come a long way since the dark days of the 1980s – so memorably depicted last year in Channel 4's *It's a Sin* – when ignorance and cruelty towards people with HIV was rife. There have been several recent positive developments; in December 2021 the Welsh Government welcomed the Ministry of Defence's lifting of restrictions on people living with HIV and PrEP users in the armed services, but ignorance still exists within certain sectors and within individuals, and there is much more to be done to stamp it out.

In the autumn of 2021, we established an HIV Action Plan Working Group chaired by Dr Marion Lyons, a Senior Medical Officer in Welsh Government, which consists of a diverse range of stakeholders with community based, professional, academic and, importantly, personally lived experiences. The guiding principles underpinning the work of this Group are that no-one should be left behind, that inclusivity and diversity should be encouraged and celebrated and that **all** the communities we serve should be an integral part of the dialogue, debate and decision making on HIV going forward.

The group has worked collaboratively across a number of themes in sub-groups and has co-created a plan which contains 26 actions aimed at eliminating all HIV in Wales and achieving zero tolerance of HIV-related stigma by 2030. The actions are focussed on five key areas: prevention; testing; clinical care; living well with HIV and tackling HIV-related stigma. I am especially pleased to see the group advocating a zero tolerance towards HIV-related stigma. People living with HIV are protected under the Equality Act 2010 and should not face discrimination, either in the workplace or in the delivery of goods, services and facilities. There is no place for ignorance or intolerance in modern Wales and this plan sets out actions aimed at tackling this.

I am very grateful to those partners and stakeholders who have worked together to make this plan a reality. I look forward to seeing the consultation responses. I firmly believe that by accepting and implementing these actions, we will make a massive difference to the lives of people living with HIV and in protecting current and future generations from the virus.



**Eluned Morgan MS**

**Minister for Health and Social Services**

## **Introduction**

The Welsh Government's Programme for Government, published in June 2021, and refreshed in December 2021, outlines a number of commitments aimed at providing effective, high quality and sustainable healthcare. One of the key commitments under this heading is to develop an HIV action plan and to tackle the stigma experienced by those living with HIV.

We recognise the importance of partnership working to achieve our commitments. This Action Plan was developed by an HIV Action Plan Working Group established by Welsh Government and supported by three task-and-finish groups who focused on: stigma; peer support and living well with HIV; and PrEP and prevention. Membership of these groups (attached at Appendix 1), came from a broad range of organisations including people living with HIV (PLWHIV), all with considerable expertise. We have also worked closely with colleagues across Welsh Government, in particular LGBTQ+ policy leads who are developing an LGBTQ+ Action Plan for Wales. Members considered current evidence and good practice and its relevance to Wales and have put forward 26 actions to help meet our 2030 elimination commitment and to tackle HIV-related stigma.

The plan contains five priority areas for action:

1. Prevention
2. Testing
3. Clinical Care
4. Living well with HIV
5. Tackling HIV-related stigma

The actions will be underpinned by three core principles:

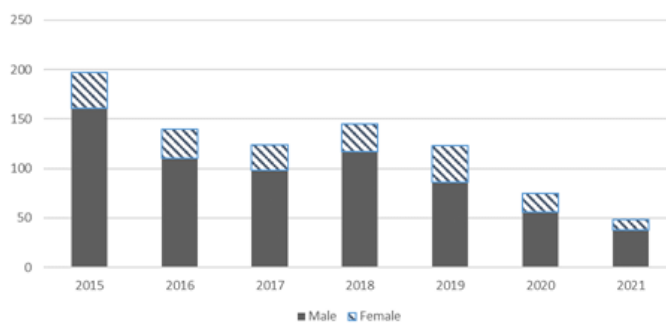
1. There should be zero tolerance of HIV-related stigma
2. That plans for implementation of new initiatives and services will be informed by, or developed with, people living with HIV. Alongside this there will be a recognition of contextual differences by sexuality, ethnicity, age, gender and location, to ensure that no one is left behind.
3. All new initiatives and services will be subject to ongoing monitoring and evaluation to make sure they meet the actions and principles laid out in the plan.

## **Current position.**

Wales has seen a 75% reduction in new diagnosis of HIV between 2015 and 2021. There was a 77% reduction in new diagnosis in men who have sex with men and a 61% reduction in new diagnosis in heterosexual individuals. Data for the latter years should be interpreted with caution as there was a reduction in testing in the early phase of the pandemic.

While the Covid-19 pandemic disrupted both society and service provision, adaptations to the way that testing and clinic services were provided in Wales meant that access to HIV testing continued, and in 2021 there were 48 people newly diagnosed with HIV infection in Wales. Approximately 2,800 people accessed care in Wales for HIV.

## **New diagnoses of HIV in Wales 2015 -2021**



## **Overarching actions:**

### **1. Establishing Wales as a Fast Track Nation**

Fast Track Cardiff & Vale – the first Fast Track Health Board in Wales – has been a highly successful collaboration over the past two years in involving local public bodies, increasing collaborative work, and producing new initiatives including GP support for HIV testing and an advocacy network, both of which have attracted non-statutory funding. Even though it is currently unfunded, Fast Track Cardiff & Vale has also successfully embedded Wales HIV Testing Week.

We now have an ideal opportunity to grow other fast track health boards and build on this initiative to co-create with all partners an all-Wales coalition, Fast Track Cymru (FTC). The aspiration is to make Wales a Fast Track Nation. It will be a collaboration of Welsh Government, Public Health Wales (PHW), each LHB, a representative of Welsh local authorities, clinicians, voluntary sector groups and people living with HIV.

Among the things we envisage the FTC network would:

- collaborate to help achieve Wales' ambition to end new cases by 2030;
- support local fast track health boards to establish and sustain themselves.
- promote changes that will improve the quality of life for people living with HIV;
- promote projects that encourage innovation and new ways of working.

## **2. Involvement of voluntary and community groups**

None of the actions in this plan will be achieved without the existing voluntary and community groups working with people living with HIV. This action plan has been developed with partners such as Pride Cymru and Terrence Higgins Trust (THT) Cymru, whose work builds on the legacy of Cardiff AIDS Helpline and Cardiff Body Positive. The Welsh Government were pleased to welcome the THT's new strategy, which looks to make a substantial investment in Welsh provision over the next three years. In addition to their work, the work of third sector HIV groups like PrEPster, National AIDS Trust, Positively UK and CHIVA – the Children's HIV Association – has all been taken into consideration. In the implementation of this plan, Welsh Government, health boards, local authorities and other partners will wish to work closely with the HIV voluntary and community sector.

## **3. Funding and development of an all-Wales sexual health case management system**

An all-Wales sexual health case management, surveillance and reporting system will be funded and developed to support networked all-Wales patient care and data collection. The case management system should have the capability to interface with the other relevant software systems, to enable the support of HIV management and surveillance widely and provide automatic data to a central portal. The system should also support reporting outputs based on World Health Organisation (WHO) targets, British HIV Association (BHIVA) standards for HIV care and other stakeholder requirements.

The case management system will provide robust data and intelligence to monitor trends, assess the success of interventions and for planning service provision. In developing the case management system, we would expect data fields on ethnicity and gender (including transgender) to be included in routine collection. It is important that there is clarity on ownership of the data and it is recommended that the ownership and oversight of this system rests with Public Health Wales.

## **4. Health boards and trusts to report on the implementation of the actions in this plan**

Health boards and trusts will provide assurance to the Welsh Government on an annual basis that the actions from HIV Action Plan are being taken forward and are making a difference.

## 5. Establishment of an Action Plan Oversight Group

An HIV Action Plan Oversight Group will be established to demonstrate our commitment to maintaining oversight and monitoring the impact that delivery of the HIV Action Plan has made.

1.	Building on the success of the Fast Track Cities initiative in Cardiff and the Vale, a new national umbrella body, Fast Track Cymru (FTC) will be established and funded by Welsh Government. This body will provide capacity and strategic focus for stakeholders, community groups and decision makers, in local fast track collaborations to support the implementation of this Action Plan and ensure that all key partners work together to achieve our objectives.
2.	Involvement of voluntary and community groups. In the implementation of this plan, Welsh Government, health boards, local authorities and other partners will work closely with the HIV voluntary and community sector.
3.	A case management surveillance system, overseen by Public Health Wales, will be funded and established to support clinical management and improve shared care. It will facilitate real-time data collection and timely publication and will ensure decision makers can measure their achievements against ambitions.
4.	Health boards and trusts will be required to detail actions they are taking to implement the actions of the HIV Action Plan in their delivery plans. Progress can be reported on at quarterly Quality and Delivery meetings between Welsh Government and health boards.
5.	An HIV Action Plan Oversight Group, which will involve all key stakeholders including health boards, local government, clinicians, voluntary and community organisations and people living with HIV, will be established to monitor progress against our ambitions and to advise Ministers on progress and any further actions required. The Group will provide an annual progress update on the implementation of this plan.

### **Priority 1: Prevention**

HIV prevention initiatives are effective in preventing HIV transmission including condom use and Pre-Exposure Prophylaxis (PrEP).

Condoms prevent HIV, other sexually transmitted infections and unwanted pregnancies. Free condoms are available in a wide range of venues in Wales and can now be ordered on-line through Sexual Health Wales On-line Testing Service. Ease of access to free condoms is further supported by the All Wales Condom Card scheme. Young people aged 13-25 years can access free, confidential sexual health advice and free condoms from the Condom-Card (C-Card) Schemes across

Wales. The schemes operate from youth centres, voluntary organisations, schools and colleges.

PrEP has been available to all those for whom it is indicated in Wales since July 2017 and is provided in Wales through sexual health clinics or infectious disease units.

Analysis has shown that PrEP is largely accessed by those who are aware and confident enough to access it, with under representation of young gay men, and people at risk of HIV through heterosexual sex. In addition, the current model for delivery of PrEP in Wales (through sexual health clinics only) disadvantages many rural communities and groups who traditionally avoid such clinics (women and ethnic minorities). Going forward, health boards must have care pathways in place for PrEP that meet demand.

While the significant social restrictions imposed at times during the Covid-19 pandemic did have a negative impact on use of PrEP, usage recovery has been swift and 1,302 individuals were prescribed PrEP in 2021. This is significantly more than the previous two years. 1,280 individuals were prescribed PrEP between July 2017 and September 2019. To address the inequity in awareness of and access to PrEP in underserved communities, pilot initiatives have commenced:

- Ask Me About PrEP programme in Wales – a peer-based approach to PrEP education;
- PrEP Campaign – a social marketing campaign delivered by Terrence Higgins Trust.

Following evaluation of their effectiveness, the HIV Action Plan Oversight Group will make further recommendations to the Minister on effective targeted PrEP promotion initiatives that address low levels of knowledge, take up in relevant groups and continuity of care.

A number of service improvement initiatives have also been developed, these include a PrEP self-referral pathway using the Sexual Health Wales online home testing service, and Preprack – an app that is designed to be used by the individual to keep track of their PrEP use.

## PREVENTION ACTIONS

6.	Continue to deliver, develop and evaluate the “Ask me about PrEP” programme in Wales.
7.	PHW, working with Fast Track Cymru collaborative networks and the voluntary and community sectors, will continue to support the wider use of, and diverse access to, PrEP (including the different regimens and formulations in development), through ongoing awareness raising for both the general public and healthcare staff.



8. Primary care and specialist sexual health services should develop and implement a shared care model to improve access and delivery of PrEP. This will enable PrEP to be provided by GPs and community pharmacies in all health board areas, with particular emphasis on delivery in rural areas and in underserved communities. In addition, health boards should explore how community organisations can support PrEP. Health boards must have care pathways in place for PrEP that meet demand.

**Priority 2: Testing**

HIV is a virus that causes a chronic lifelong infection that can be managed very successfully by antiretroviral therapy (ART). People diagnosed with HIV who are on ART live long and healthy lives. People who have the HIV virus for some years without a diagnosis and treatment will most likely develop advanced HIV disease, or acquired immune deficiency syndrome (AIDS). For this reason an early diagnosis is important.

In addition, individuals who adhere to ART will have a sustained, undetectable level of HIV viral load in their blood and will not transmit HIV to their sexual partners. This is commonly known as **Undetectable = Untransmissible (U = U)**, where a person living with HIV who is on treatment and has an undetectable viral load cannot sexually transmit HIV.

While there is still more progress to be made, HIV testing episodes in Wales have recovered from the significant decline seen at the start of the pandemic. This is shown in the graph below.

HIV testing by month in Wales 2019 -2022



**Covid-19 Lockdown Timeline - 2020**

- 24<sup>th</sup> of March – 29<sup>th</sup> of May: First lockdown
- 23<sup>rd</sup> of October – 9<sup>th</sup> of November: Second “firebreak” lockdown
- 20<sup>th</sup> of December: Beginning of Third lockdown

Although the number of new HIV diagnoses is low, there is concern that a significant number of people are presenting with late-stage HIV. While life expectancy of people living with HIV on effective treatment is now similar to that of the general population, the most important predictor of morbidity and premature mortality is late diagnosis. Late diagnosis also increases the risk of onward HIV transmission.

In 2021, 42% of new cases in Wales were late diagnoses, an improvement on previous years. This is still unacceptable and there is an urgent need to understand the missed opportunities that have resulted in people presenting late and to take appropriate measures to address the barriers to testing. We also need to ensure that opportunities to offer a HIV test are not missed in health care settings, and that clinicians focus testing on those presenting with clinical signs or symptoms which may suggest infection with HIV.

There will be many opportunities for healthcare providers to work together to provide seamless care and make every contact count. There is significant read across to the Hepatitis C elimination agenda and some of the communities we need to reach to achieve elimination will be the same ones we need to encourage to have an HIV test. An Inclusion Health Programme is being developed by PHW to support this joined up approach.

The Sexual Health Wales online home testing service has improved access to HIV testing for many, but more can be done to:

- improve the user journey for those requiring a test;
- reach out to and improve access to testing for underserved communities, including ethnic minorities;
- explore a “click and collect” service, known to improve access to people living with a partner or family members, those in houses of multiple occupancy and ethnic minorities.

HIV prevalence in Wales is low and we need to ensure that our HIV testing strategy reflects this, as it will be challenging to identify those with undiagnosed infection. The United Nations set a goal of 90-90-90 (that by 2030, 90% of people living with HIV will be diagnosed, 90% of those diagnosed will be on antiretroviral treatment and 90% of those receiving antiretrovirals will be virally suppressed). Work undertaken by Fast Track Cardiff and Vale, supported by data from Public Health England, shows that we had achieved this goal in Cardiff by 2018, but we can go further. In 2019 it was estimated that for Cardiff 7% of HIV infections remained undiagnosed.

Evidence recommends that, for low positivity areas, testing is focussed on primary care targeted home/community testing and testing for other clinical indicator conditions. Fast Track Cardiff and Vale has piloted a successful HIV testing initiative in GP practices in a Cardiff GP Cluster - *Texting for Testing*. Through the proposed new collaborative Fast Track Cymru, this should be rolled out more widely by health boards and GPs across Wales. A link to the report on the pilot can be found here: [gp-facilitated-hiv-home-testing-pilot-evaluation-report-v1.0-15112021.pdf \(wordpress.com\)](https://www.gp-facilitated-hiv-home-testing-pilot-evaluation-report-v1.0-15112021.pdf)

An anonymised seroprevalence study undertaken by PHW for HIV and Blood Borne Viruses will guide any further refinements to our testing framework in Wales.

The emergence of monkeypox since May 2022 in multiple countries that are not endemic for monkeypox virus has reinforced the need to ensure that individuals who have developed symptoms have ready access to advice and appropriate testing and clinical care.

### **TESTING ACTIONS:**

9.	We need to make every contact count. Testing should be in line with current BHIVA/BASHH/BIA Adult HIV Testing guidelines 2020 (HIV-testing-guidelines-2020.pdf (bhiva.org)) with testing provided as opt out for patients attending certain healthcare settings, and testing strategies reviewed and amended in line with local HIV prevalence data.
10.	PHW will ensure that the online testing will continue to be made more accessible by the provision of sustainable funding for the existing online testing service including an option for rapid test and “click and collect” services. The online testing will be promoted more widely by PHW to tackle inequalities and the user journey improved.
11.	A plan will be developed with Fast Track Cymru, health boards and voluntary & community partners to ensure no individual or community will be left behind when it comes to testing. This will include community HIV testing kits through community groups, faith communities and support services to reach the needs of underserved populations.
12.	In collaboration with health boards and GP clusters the GP “Texting for testing” pilot, which has operated successfully in certain areas of Cardiff, will be extended more widely throughout Wales.
13.	The all-Wales HIV testing week will be funded appropriately by Welsh Government for the duration of this action plan. Health boards, local authorities and partners will be expected to support this initiative.
14.	Tackling late diagnosis will be made a priority. It will be mandatory that all late HIV diagnoses should be investigated and reported by health boards. Following an annual meeting to consider outcomes, lessons learned will be shared and reported to the HIV Oversight Group.
15.	HIV awareness training will be mandatory for healthcare staff. Training modules for clinicians should be modified to raise awareness of the specific indicator conditions when HIV testing must be undertaken.

### **Priority 3: Clinical Care**

The primary aim of antiretroviral therapy (ART) is the prevention of HIV associated morbidity and mortality. The majority of people attending specialist HIV services are on effective ART with virological suppression and good treatment outcomes,

including a life expectancy as good as the general population when treatment is started promptly. In the UK in 2020 around 99% of those diagnosed with HIV had initiated ART, with 97% of those on ART having a suppressed viral load. Specifically for Wales, in 2020 of the 2,448 residents of Wales receiving care for HIV 96% had achieved viral load suppression.

A further benefit of ART is the reduction in sexual transmission – **a person living with HIV who is on treatment and has an undetectable viral load cannot sexually transmit HIV.**

However, there remains a very small number of people living with HIV for whom engagement with clinical care and adherence to ART is extremely challenging and these individuals are at risk of increased morbidity and mortality, and of transmitting the virus to other people.

With the implementation of the Sexual Health Wales On-Line Testing Service, many asymptomatic individuals who previously would have attended sexual health clinics no longer require specialist sexual health service support. As a result, specialist sexual health services can focus resources on complex cases including those at high risk of HIV, particularly in underserved and hard to reach communities, with the aim of increasing testing, maximising provision of HIV prevention interventions (as above) and reducing the incidence of late HIV diagnosis.

HIV services (whether they are located in sexual health or other services, e.g. infectious diseases) require adequate staffing and other resources in order to provide high quality care to all people living with HIV, but in particular, newly diagnosed individuals, underserved communities and those individuals who struggle to engage with care and adhere to effective ART. This complex work requires a multidisciplinary approach with the aim of supporting people to take effective ART, maintain an undetectable viral load and therefore to minimise onward transmission, thereby working towards the 90:90:90 goals and HIV elimination.

HIV services should participate in the BHIVA national audit programme and evaluate their services against the BHIVA Standards of Care for People Living with HIV.

The mental health requirements of those living with HIV also need to be better addressed. All HIV clinics should have access to psychological support and prioritise patient referral into peer support and mental health services elsewhere in the NHS or in the voluntary and community sector if needed.

#### **CLINICAL CARE ACTIONS:**

16.	All services providing HIV care in Wales should review their staffing structure, supporting and protecting the HIV workforce. They need a skilled workforce to provide care to more complex cases, re-engage with positive individuals lost to care and can reach out to underserved populations. A focus must be maintained on those actually or potentially lost to care over the life of the plan. Care will be delivered in accordance with BHIVA Standards of Care for Living with HIV and BHIVA national guidance. This will involve innovative
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	ways of working, and the co-production with PLWHIV, of care pathways with a focus on underserved populations.
17.	All newly diagnosed individuals with HIV should be seen within a specialist HIV service within two weeks of diagnosis. All should be referred for peer support and fully supported to remain in clinical care, as well as having access to psychological support.

#### **Priority 4: Living Well with HIV**

HIV is a long-term condition and being diagnosed with HIV can be distressing, with feelings of anxiety and depression being common. In addition to the support provided by specialist health clinic staff with referral to specialist counsellor or psychologist, many individuals access voluntary sector support provision. Most find it helpful to talk to others with HIV.

Benefits of support, including peer support, include maintaining health and well-being through better adherence and understanding of health conditions. Peer support has also been found to create economic benefits by reducing pressure on other health and social care services. It can also have an impact in strengthening communities, creating social connections and contributing to public health and prevention.

Wales does not currently have commissioned HIV support services across the country nor a dedicated HIV peer support network. Cardiff University is currently undertaking a review of peer support for people living with HIV in Wales and will propose potential principles and structures of an HIV peer support network for Wales, which will then be further developed in dialogue with service users and providers.

It is important that people living with HIV understand and are empowered to have a role in the management of their health and well-being. There are a number of self-management courses and workshops for people living with any long-term health condition or a caring role. There is an opportunity in Wales to deliver a programme for those living with HIV through Education Programmes for Patients (EPP Cymru) run by Public Health Wales.

Inequality in HIV care is a matter of serious concern. We need to ensure that we reach out to underserved populations including older people and ethnic minority groups living with HIV. There is no one-size-fits-all solution, but we need the meaningful involvement of their diverse communities using the most appropriate means of communication if quality of life of those with HIV is to improve.

## Living Well with HIV

### ACTIONS:

18.	Those living with HIV will be empowered to better self-manage their health through participation in the Positive Self-Management Programme (PSMP) provided by EPP Cymru.
19.	A national peer support programme for Wales will be commissioned by Welsh Government in the autumn of 2022, following the conclusion of research work carried out by Cardiff University into the potential principles and structures of such a programme.
20.	Fast Track Cymru and its local networks working with voluntary and community groups should support health boards and local authorities to engage meaningfully with all diverse communities including ethnic minorities and faith groups so that testing for HIV is accepted, stigma is reduced and those living with HIV are supported to live better lives.

### **Priority 5: Tackling Stigma**

Fear and misunderstanding often lead to prejudice against people with HIV, even among service providers. This prejudice and discrimination leads to feelings of hopelessness and shame in those struggling to cope with their situation, creating a serious barrier to diagnosis and treatment.

Zero tolerance of stigma and discrimination is one of the five core principles in this action plan. Stigma impacts on the uptake of HIV testing, sharing of HIV status, engagement and retention in care with healthcare personnel, and uptake of and adherence to HIV treatment. This prevents people from using health care and fuels the ongoing transmission of HIV.

The health system collects a vast amount of insight from patients, and we want to ensure that we are acting on this feedback. The Positive Voices National Survey in 2017 provided insight into the experience of a large and representative sample at a UK level of the HIV population when accessing healthcare. Two centres in Wales promoted the survey and the results for Wales showed that:

- around one in seven patients have never told anyone about their HIV status outside a health care setting;
- 18% of patients reported that they were worried about being discriminated against in a health care setting in the last year;
- 21% of patients said they had avoided seeking healthcare when they had needed it in the last year and
- 5% said they had actually been refused healthcare or delayed a treatment or medical procedure in the last year.

HIV prevention is also dramatically hindered by stigma. Studies have linked stigma to increased risk, non-disclosure and avoidance of health services, including those which may prevent mother to child transmission of HIV.<sup>2</sup> Stigma is also linked to fear and avoidance of HIV testing.<sup>3</sup> Given the preventative benefits of HIV treatment, the part that stigma plays as a barrier to accessing testing and care has an important role in driving the epidemic. Tackling stigma is vital to improving the lives of people living with HIV and is integral to tackling HIV  
([Jun 16 Tackling HIV Stigma.pdf \(nat.org.uk\)](#))

The Changing Perceptions report identifies what needs to be done within the NHS, including zero tolerance of HIV stigma and discrimination, and staff training. An awareness of the low risk of transmission is important, as is raising awareness of actions and language that could be perceived as stigmatising.

The HIV Action Plan Working Group believe the most effective way to address stigma is through education:

- Know the facts. Educate individuals about HIV.
- Educate others. Pass on facts and positive attitudes; challenge myths and stereotypes.

**To achieve our goal of zero tolerance towards HIV stigma we propose the following actions:**

21.	An HIV awareness training programme will be developed collaboratively, to address misunderstanding and stigma in the healthcare sector, and which will be mandatory for all healthcare providers.
22.	Social Care Wales will adapt this training programme for use in the social care sector and develop a plan for its delivery to all social care workers.
23.	The message that people living with HIV on effective treatment can't pass it on to a partner should be promoted widely and all HIV training modules should be consistent with this message.
24.	Resources in the school curriculum should effectively address HIV, PrEP and stigma and be consistent with the latest evidence on HIV.
25.	FTC should work with collaborating organisations and the Advocacy network to ensure that awareness of stigma and the promotion of positive messages such as U=U and zero tolerance is a common and ongoing thread in their day to day work.
26.	PHW, working with partner organisations and people living with HIV, will introduce and promote an annual Wellbeing Survey of People Living with HIV to monitor whether change has been affected and is effective.

**Summary of all Actions set within the HIV Action Plan:**

1.	Building on the success of the Fast Track Cities initiative in Cardiff and the Vale, a new national umbrella body, Fast Track Cymru (FTC) will be established and funded by Welsh Government. This body will provide capacity and strategic focus for stakeholders, community groups and decision makers, in local fast track collaborations to support the implementation of this Action Plan and ensure that all key partners work together to achieve our objectives.
2.	Involvement of voluntary and community groups. In the implementation of this plan, Welsh Government, health boards, local authorities and other partners will work closely with the HIV voluntary and community sector.
3.	A case management surveillance system, overseen by Public Health Wales, will be funded and established to support clinical management and improve shared care. It will facilitate real-time data collection and timely publication and will ensure decision makers can measure their achievements against ambitions.
4.	Health boards and trusts will be required to detail actions they are taking to implement the actions of the HIV Action Plan in their delivery plans. Progress can be reported on at quarterly Quality and Delivery meetings between Welsh Government and health boards.
5.	An HIV Action Plan Oversight Group, which will include all key stakeholders including health boards, local government, clinicians, voluntary and community organisations and people living with HIV, will be established to monitor progress against our ambitions and to advise Ministers on progress and any further actions required. The Group will provide an annual progress update on the implementation of this plan.
6.	Continue to deliver, develop and evaluate the “Ask me about PrEP” programme in Wales.
7.	PHW, working with Fast Track Cymru collaborative networks and the voluntary and community sectors, will continue to support the wider use of, and diverse access to, PrEP (including the different regimens and formulations in development), through ongoing awareness raising for both the general public and healthcare staff.
8.	Primary care and specialist sexual health services should develop and implement a shared care model to improve access and delivery of PrEP. This will enable PrEP to be provided by GPs and community pharmacies in all health board areas, with particular emphasis on delivery in rural areas and in underserved communities. In addition, health boards should explore how community organisations can support PrEP. Health boards must have care pathways in place for PrEP that meet demand.
9.	We need to make every contact count. Testing should be in line with current BHIVA/BASHH/BIA Adult HIV Testing guidelines 2020 (HIV-testing-guidelines-2020.pdf (bhiva.org)) with testing provided as opt out for patients attending certain healthcare settings, and testing strategies reviewed and amended in line with local HIV prevalence data.



10.	PHW will ensure that the online testing will continue to be made more accessible by the provision of sustainable funding for the existing online testing service including an option for rapid test and “click and collect” services. The online testing will be promoted more widely by PHW to tackle inequalities and the user journey improved.
11.	A plan will be developed with Fast Track Cymru, health boards and voluntary & community partners to ensure no individual or community will be left behind when it comes to testing. This will include community HIV testing kits through community groups, faith communities and support services to reach the needs of underserved populations.
12.	In collaboration with health boards and GP clusters the GP “Texting for testing” pilot, which has operated successfully in certain areas of Cardiff, will be extended more widely throughout Wales.
13.	The all-Wales HIV testing week will be funded appropriately by Welsh Government for the duration of this action plan. Health boards, local authorities and partners will be expected to support this initiative.
14.	Tackling late diagnosis will be made a priority. It will be mandatory that all late HIV diagnoses should be investigated and reported by health boards. Following an annual meeting to consider outcomes, lessons learned will be shared and reported to the HIV Oversight Group.
15.	HIV awareness training will be mandatory for healthcare staff. Training modules for clinicians should be modified to raise awareness of the specific indicator conditions when HIV testing must be undertaken.
16.	All services providing HIV care in Wales should review their staffing structure, supporting and protecting the HIV workforce. They need a skilled workforce to provide care to more complex cases, re-engage with positive individuals lost to care, and reach out to underserved populations. A focus must be maintained on those actually or potentially lost to care over the life of the plan. Care will be delivered in accordance with BHIVA Standards of Care for Living with HIV and BHIVA national guidance. This will involve innovative ways of working, and the co-production with PLWHIV of care pathways with a focus on underserved populations.
17.	All newly diagnosed individuals with HIV should be seen within a specialist HIV service within two weeks of diagnosis. All should be referred for peer support and fully supported to remain in clinical care, as well as having access to psychological support.
18.	Those living with HIV will be empowered to better self-manage their health through participation in the Positive Self-Management Programme (PSMP) provided by EPP Cymru.
19.	A national peer support programme for Wales will be commissioned by Welsh Government in the autumn of 2022, following the conclusion of research work carried out by Cardiff University on the potential principles and structures of such a programme.

20.	Fast Track Cymru and its local networks working with voluntary and community groups should support health boards and local authorities to engage meaningfully with all diverse communities including ethnic minorities and faith groups so that testing for HIV is accepted, stigma is reduced and those living with HIV are supported to live better lives.
21.	An HIV awareness training programme will be developed collaboratively, to address misunderstanding and stigma in the healthcare sector, and which will be mandatory for all healthcare providers.
22.	Social Care Wales will adapt this training programme for use in the social care sector and develop a plan for its delivery to all social care workers.
23.	The message that people living with HIV on effective treatment cannot pass it on to a partner should be promoted widely and all HIV training modules should be consistent with this message.
24.	Resources in the school curriculum should effectively address HIV, PrEP and stigma and be consistent with the latest evidence on HIV.
25.	FTC should work with collaborating organisations and the Advocacy network to ensure that awareness of stigma and the promotion of positive messages such as U=U and zero tolerance is a common and ongoing thread in their day to day work.
26.	PHW, working with partner organisations and people living with HIV, will introduce and promote an annual Wellbeing Survey of People Living with HIV to monitor whether change has been affected and is effective.

## Appendix 1

### Membership of the HIV Action Plan Task and Finish Group

Marion Lyons (Chair)	Welsh Government
Zoe Couzens	Public Health Wales
Peter Jones	Welsh Government
Stephen Thomas	Welsh Government
Nerys Llewellyn	Welsh Government
Alessandro Ceccarelli	Welsh Government
Lisa Power	Fast Track Cities Cardiff and the Vale
Richard Angell	Terrence Higgins Trust
Jim Fielder	Terrence Higgins Trust
Gianpiero Molinu	Pride Cymru
Kate Nambiar	Welsh Gender Service
Davinia Green	Stonewall Cymru
Rachel Jones	Public Health Wales Virologist
Laura Cunningham	British Association of Sexual Health and HIV
Jonathan Underwood	Consultant physician at University Hospital of Wales
David Gillespie	Cardiff University
Darren Cousins	Consultant in sexual health and HIV
Fiona Clark/ Judy Thomas	Community Pharmacy Wales
Sara Bodey/Phil White	General Practitioner Committee Wales
Steven Evans-Jones	Expert Patient

In addition: Baroness Wilcox of Newport attended the introductory meeting.

#### **The following also contributed to the work of the sub-groups:**

Will Nutland, PrEPster

Marc Thompson, PrEPster

Iestyn Wyn, Stonewall Cymru

Sue Channon, Cardiff University

Garry Brough, Positivity UK

Christine Roach, Public Health Wales

#### **Secretariat for the groups was provided by:**

Helen Tutt, Welsh Government

Nicholas Price, Welsh Government

## Definitions

- HIV:** HIV (human immunodeficiency virus) is a virus that attacks the body's immune system. If HIV is not treated, it can lead to AIDS (acquired immunodeficiency syndrome). There is currently no effective cure. Once people get HIV, they have it for life. But with proper medical care, HIV can be controlled.
- AIDS:** AIDS (acquired immune deficiency syndrome) is the name used to describe a number of potentially life-threatening infections and illnesses that happen when your immune system has been severely damaged by the HIV virus. While AIDS cannot be transmitted from one person to another, the HIV virus can.
- PrEP:** PrEP (pre-exposure prophylaxis) is a medication people can take regularly to prevent them getting HIV from sex or injection drug use. When taken as prescribed, PrEP is highly effective for preventing HIV.
- Online testing:** Ordering your test online to be delivered at home.
- ART:** Antiretroviral therapy – can also be called combination therapy or HIV treatment.
- U=U:** Undetectable = Untransmittable' (U=U) is a campaign explaining how the sexual transmission of HIV can be stopped. When a person is living with HIV and is on effective treatment, it lowers the level of HIV (the viral load) in the blood. When the levels are extremely low (below 200 copies/ml of blood measured) it is referred to as an undetectable viral load. This is also medically known as virally suppressed. At this stage, HIV cannot be passed on sexually.
- Seroprevalence:** Seroprevalence is the number of persons in a population who test positive for a specific disease based on serology specimens
- WHO:** World Health Organisation
- BHIVA:** British HIV Association
- Underserved population:** Populations who face barriers in accessing and using services, includes populations underserved because of geographic location, religion, sexual orientation, gender identity, underserved racial and ethnic populations.

## **Draft HIV Action Plan for Wales**

### **A consultation response on behalf of Cardiff Council**

Cardiff Council welcomes the draft HIV Action Plan for Wales and would like to acknowledge the hard work and commitment from all concerned in its development. We are very grateful for the opportunity to provide comments on the draft plan and would also like to applaud the leadership that Welsh Government have shown in setting out their aspiration of developing the plan within the Programme for Government and delivering on that promise through the publication of this draft.

Cardiff Council has worked for some while with our partners within Fast Track Cardiff & Vale who are passionately committed to making a difference to people living with HIV and achieving the goal of zero new infections by 2030. The Council would like to personally thank Dr Marion Lyons and the members of the HIV Action Plan Task and Finish Group for their work on the Action Plan.

Cardiff Council commends the ambition of the plan and is very happy to become a key partner in the delivery of the commitments detailed within it. Cardiff Council welcomes the five overarching priority areas outlined within the action plan which provide focus and a clear way forward towards a Wales free of new transmissions of HIV and a country where people living with HIV are supported to live well and free of stigma.

Cardiff Council also welcomes the 3 core principles of the action plan;

- A zero tolerance approach to stigma.
- A focus on co-creation in partnership with people living with HIV from all backgrounds, cultures, sexuality, ages, genders and geographical areas
- A commitment to robust monitoring and evaluation are principles that we can all support.

#### **1. Do you agree with the five overarching actions identified within this plan? Are there other overarching actions that should be included?**

Cardiff Council welcomes and agrees with the five overarching actions identified within the action plan. Please see below for further comment:-

#### **Establishing Wales as a Fast Track Nation**

Cardiff welcomes the establishment of a Fast Track Cities Cymru as this gives the opportunity to establish a body to drive progress, roll out good practice, foster smarter working, knowledge sharing and efficiency of resources as well as ensuring the avoidance of duplication and the ability to capitalise on local expertise. We also welcome the Working together in Wales to deliver a co-ordinated approach. It is Cardiff's belief that this will support the achievement of the ambition of the plan. This approach will also facilitate the

management of co-ordinated roll out of initiatives across the country which may potentially be significant in the avoidance of systems becoming overwhelmed.

### **Involvement of voluntary and community groups**

The effectiveness of public services collaborating with colleagues in the third sector is apparent through a rich history of partnership programmes, expansion of community engagement and increased support for those in need. Further capitalising on this partnership to deliver the outcomes detailed within the plan will clearly contribute towards the achievement of the vision. It is evident that the ongoing involvement and steer of the Terence Higgins Trust (THT) Cymru and Pride Cymru amongst other HIV voluntary and community groups will be vital as we unite in the achievement of the ambition of this plan.

### **Funding and development of an all-Wales sexual health case management system**

The funding and development of an all-Wales sexual health case management system is a very positive step. Cardiff Council would echo the comments relating to the ownership and oversight of these systems lying with Public Health Wales. It is clear from the work that has been undertaken thus far that the expertise and leadership of Public Health Wales should govern the development of a robust surveillance system for Wales.

### **Establishment of an Action Plan Oversight Group**

The establishment of the HIV Action Plan Oversight group with the aim of ensuring effective scrutiny and driving progress against all the actions listed within the plan is key. The reporting of evaluation and monitoring of progress as well as highlighting specific challenges to Ministers will demonstrate credibility and ownership of each workstream. Additionally, this approach has the potential to send a clear message to those living with HIV in Wales that Welsh Government is committed to progressing the commitments of the plan.

## **2. Do you agree with the proposed list of actions? Are there any that you would add or remove from the 26 currently identified?**

Cardiff Council welcomes all 26 actions listed throughout the action plan and appreciate the extensive work that has taken place to arrive at the draft detail. Any suggestions relating to the detail of any specific actions are made as positive suggestions to complement the draft plan.

### **Priority 1: Prevention**

The “Ask me about PrEP” project, piloting the impact of training and supporting peer mobilisers in talking to their peers about PrEP has huge potential to be a powerful vehicle for achieving the goal of preventing the transmission of HIV. There is potential for local authorities to amplify the positive outcomes of the project. Within the context of Cardiff, the authority has Screening Champions that help promote Public Health Wales screening

programmes alongside their customer facing role. We would suggest that there is potential to develop communities focused PrEP 'Champions' within Cardiff and authorities across Wales.

It is apparent that wider awareness and use of PrEP within diverse communities is an important factor in the journey towards the elimination of HIV transmission within Wales. An area of consideration is local authorities engagement with service users across all demographics, including homeless services and those newly arrived within authorities. This offers a potential opportunity to diversifying access to information and provision of PrEP within Local Authorities in Wales.

## **Priority 2: Testing**

There are opportunities for local authorities to support the tackling of inequalities in relation to testing access and click and collect services. Local authorities provide free access to public computers with networked online access as well as free Wifi throughout a network of over 300 public libraries within Wales, as well as wider community venues. The provision of 'Click and Collect' could also be explored within these venues as well as targeted areas such as homeless services and other venues.

The ambition of ensuring no individual or community is left behind is of course vital. It is noted that local authorities are not listed as a partner in this objective. Local authorities deliver a wide range of services to all communities. There is potential for them to support the extensive community engagement and necessary widespread detailed communication programmes within Action 11.

It is clear from reviewing the evaluation report related to the highly successful 'Texting for Testing' pilot within Cardiff that this represents an opportunity to ensure that messaging is effectively communicated to communities in innovative ways. The evidence of the pilot shows that this has a positive effect on testing uptake and captures positive diagnoses including those in need of more immediate medical interventions. The extension of this scheme is to be welcomed and should be resourced effectively to ensure the supporting infrastructure meets the amplified demand.

Cardiff Council welcomes the opportunity to be an active partner in raising awareness and working towards amplifying key messaging across communities throughout HIV testing week. Digital and non-digital elements should be considered within the communication planning in order for those who may be digitally excluded by choice or otherwise, including older people, to be reached.

## **Priority 4: Living Well with HIV**

The national peer support programme for Wales will be commissioned by Welsh Government in the autumn of 2022, following the conclusion of research work carried out by Cardiff University on the potential principles and structures of such a programme. Cardiff Council acknowledges the significance of this development which is clearly key to ensuring the people living with HIV are supported.

This is a very positive step forward in supporting people living with HIV to live well within the community. It is understood that a stepped or diverse approach to peer support will be necessary, however local authority community venues including Hubs/Libraries should be

considered perhaps further along the pathway of those living with HIV. Cardiff Council would welcome being included in a timeline of the rollout of peer support as we work towards tolerant communities where people do not feel that they need to hide their diagnosis and can happily meet and connect in local community venues.

Cardiff Council would also welcome the opportunity to work together with Fast Track Cymru and the associated networks to establish effective ways of reaching all diverse communities. This represents an opportunity to deliver positive messaging, information provision and to work together collectively to remove barriers and engage positively with communities.

### **Priority 5: Tackling Stigma**

Cardiff Council welcomes the action around the provision of HIV awareness training to the social care sector and look forward to seeing the details of the delivery plan.

In addition to health care providers, social care workers and schools, Cardiff Council would like to see HIV awareness training extended further to include wider local authority staff. Many staff in local authorities outside of the sectors detailed within the plan provide front line services within the communities they serve. Cardiff Council is also one of the largest employers in Wales and is committed to providing dignity at work and promoting and supporting the health and wellbeing of our staff. We would welcome the opportunity to learn further how we could support any staff members who are living with HIV as well as embedding a zero-tolerance approach within our organisation.

It would be helpful if evidence-based teaching could be supported to ensure that the goals of increasing knowledge around prevention as well as tackling stigma can be achieved within schools. It is our understanding that there are Welsh Government plans to create a bank of Relationships and Sexuality Education code (RSE) resources on Hwb. Oversight and monitoring of the evidenced based approach by the HIV Action Plan oversight group is potentially key to ensure that young people are given the right information at the appropriate time.

Cardiff Council welcome the opportunity to be a collaborating organisation to ensure that awareness of stigma and the promotion of positive messages such as U=U and zero tolerance is a common and ongoing thread throughout all the actions that we make a commitment to. It is evident that this messaging is key to working towards the goals set out within the action plan.

An annual Wellbeing Survey of People Living with HIV to monitor whether change has been affected and is effective is incredibly important to ensure that the action plan is heading in the right direction or identifying areas that may need further work from the viewpoint of the most important stakeholder – those that are living with HIV. We would applaud this initiative.



**3. What are the challenges that could mean the commitment to eliminating HIV transmission by 2030 are not met? Are there any clear challenges relating to any specific actions you feel should be highlighted?**

- Sufficient resourcing of all action delivery plans
- Reaching underserved communities – it is vital that we all work together to achieve this aim
- Existing pressures on public services as well as the third sector – it is important that this capacity is built in to ensure the aspirations of the plan are achieved.
- Ensuring the right message reaches the right people – all forms of communication networking should be considered including dedicated social media.

**4. Are there any resources (this could include funding, staff time, training, access to support or services among other things) that are not referred to in our Plan, but will be necessary in achieving the aims and actions detailed within this Plan?**

The development of far reaching promotional and media campaigns focusing on key messages around prevention, tolerance, dispelling myths and testing across Wales would contribute to wider awareness and positive change. National resources could also include 101 leaflets that provide key messaging around prevention, myth busting and support. It would also be beneficial to work towards a catalogue of national resources that include communication tools specific to underserved communities. It would seem sensible to include a reasonable provision within the financial planning for this work.

**5. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:**

In 2021, Welsh Government published 'Age Friendly Wales: Our Strategy for an Ageing Society', which commits Wales to the development of age-friendly cities and communities across the country. Cardiff is proud to have recently been successful in their application to join the World Health Organisation's Global Network for Age-friendly Cities and Communities and will soon be joined by the other local authorities across Wales. This collective commitment is intended to drive positive changes and developments that benefit older people. With this focus in mind, as well as understanding that more people are living into older age with HIV, it would seem appropriate to have more focus within the plan specific to older people that acknowledge and work towards overcoming factors that risk their individual wellbeing. Key areas could include targeted age friendly preventative programmes, financial advice and support, tackling loneliness and isolation strategies and targeted clinical support.

The action plan outlines that the most important predictor of morbidity and premature mortality is late diagnosis, and that late diagnosis also increases the risk of onward HIV transmission. Our understanding is that older people are more likely to be diagnosed late; of

those diagnosed with HIV within the UK in 2019, 59% of people were aged 65 and older. Cardiff Council would welcome the opportunity to support the development and delivery of targeted efforts including promotional programmes to reduce the number of late diagnoses in older people, as well as support for those who have been diagnosed.

Cardiff Council can support those living with HIV to better self-manage their health by promoting and signposting the Positive Self Management Programme (PSMP) provided by EPP Cymru. In addition, we would advocate for the identification and provision of HIV specific resources including verified book resources which could be provided through the Hubs & Libraries collections. A successful Welsh Government funded scheme, in partnership with Society of Chief Librarians Cymru and The Reading Agency, called Reading Well - Books on Prescription has been rolled out throughout Welsh Public Libraries focusing on the topics of Dementia, Mental Health and Children's Mental Health. The books have been selected by expert panels of clinicians, 3rd sector organisations and those with lived experience of the conditions. This book stock is available free of charge and provides therapeutic support and help in book form. This could potentially be explored as another avenue to provide support to those living with HIV in Wales.

## **Conclusion**

Thank you once again for the opportunity to comment on the draft HIV Action Plan for Wales. Cardiff Council looks forward to the publication of the finalised action plan and the opportunity to work in partnership with Welsh Government, partners and stakeholders to prevent new cases and improve the lives of people living with HIV.

**CARDIFF COUNCIL  
CYNGOR DINAS CAERDYDD****CABINET MEETING: 28 SEPTEMBER 2022**

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**APPLICATION FOR A HACKNEY CARRIAGE FARE  
INCREASE (TO CONSIDER REPRESENTATIONS  
RECEIVED)****TRANSPORT AND STRATEGIC PLANNING  
(COUNCILLOR DAN DE'ATH)****AGENDA ITEM: 12**

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**Reason for this Report**

1. On [23 June 2022](#), Cabinet approved a proposal to vary the current rate of hackney carriage fares in Cardiff, subject to a statutory public notice period inviting representations to the proposal.
2. During the public notice period, The Licensing Authority received 1 objection (that included a counter proposal) and 226 individually signed identical letters of support. Cabinet is requested to consider the representations and to determine whether to approve the original decision to vary the table of fares or authorise an alternative variation.

**Background**

3. On 23 June 2022 Cabinet considered an application put forward by the Cardiff Hackney Carriage Alliance and Unite the Union to vary the current rate of hackney carriage fares in Cardiff. A copy of this report and appendices are contained in Appendix A.
4. Cabinet resolved to approve the application, subject to a statutory 14-day public notice period, which invited objections to the proposed variation. A Public Notice was placed in the South Wales Echo on 11 July 2022, a copy of this notice is contained in Appendix B.
5. Section 65 of the Local Government (Miscellaneous Provisions) Act 1976 states that the Council has the power to fix the rates or fares within the district for time and distance, and all other charges in connection with the hire of a vehicle or with the arrangements for the hire of a vehicle, to be paid in respect of the hire of hackney carriages by means of a table of fares, made or varied.

6. When setting hackney carriage fares there is no requirement under the Act to consider external factors, and there is no limit on the amount of increase or variation.

### **Responses to the Public Notice**

7. In response to the public notice, 1 objection was received from Dragon Taxis Cardiff, and 226 individually signed identical letters of support were received from licensed Cardiff drivers.

8. The objection from Dragon Taxis Cardiff included a counter proposal for Cabinet to consider. A copy of the objection and counter proposal from Dragon Taxis Cardiff is contained in Appendix C.

9. A copy of the letters of support received from 226 Cardiff licence holders is contained in Appendix D. The letters received to the department were individually signed and included their licence number and home address. The letter states:

“I am a member of the public and a taxi driver who would like to support the hackney increase proposal as the trade is in a critical situation at present due to Inflationary pressures that have hit the trade harder than other industries which has resulted in many drivers leaving the trade, with the cost of living and as you're probably aware price of fuel For example, diesel has risen by 61% since the last time the hackney carriage fares were increased (£1.22 per litre in March 2018 to £1.97 in July 2022) and the average price of used cars rose to 32% in the months between April 2021 and April 2022.

Many Hackney drivers have their plates on hold because they cannot make enough money to live on after expenses, because of the increase in running costs. If this increase is not implemented, our trade is on a downward spiral and there will be fewer and fewer Hackneys taxis available public. For these reasons, I am fully in supporting of the proposed meter increase in this open public consultation”

10. Cabinet may approve the original decision on 23 June, or approve the alternative proposal put forward by Dragon Taxis Cardiff or may choose an alternative variation to the table of fares.

11. In summary, Dragon Taxis Cardiff supports an increase in principle, but objects to the proposed increase on the grounds that it is excessive and will significantly reduce passenger demand, negatively impacting passengers and drivers.

They state that the full impact of the waiting time element of the proposal has been overlooked and has the potential to significantly increase overall fares. The focus appears to have been on the distance charges which they feel is misleading.

12. A copy of Dragon's objection/counter proposal was shared with the Hackney Carriage Alliance/Unite the Union. They provided further

comments in response to Dragon for Cabinet to consider. Their comments are contained in Appendix E.

### **Officer Comments**

13. The proposed increase will apply to all hackney carriage drivers. Drivers are self-employed and may choose to contract with an operator to receive jobs, alternatively they may choose to work independently from designated ranks or pick up fares from the roadside.
14. The hackney carriage table of fares specifies the maximum amount that a hackney carriage may charge for journeys that start and end within Cardiff. Drivers and businesses are permitted to charge less than the legal fare if they believe that it will give them a commercial advantage.
15. The payment a driver receives from an operator or fees a driver pays to use the operator's platform is a private contractual matter. This should not be a consideration for the purposes of determining whether to vary the table of fares.
16. Consideration should be given to obtaining a balance between increasing the fare to compensate in the increase of costs of running a hackney carriage and ensuring that the increase does not deter the public from using hackney carriages.
17. The Public Notice invited comments from any person. No comments or objections were received from members of the public who were not connected to the trade.
18. The hackney carriage trade has requested that any amendment to the Table of Fares be introduced at the earliest opportunity. If Cabinet are minded to agree a variation, this can be implemented as soon as the call-in period has ended.

### **Reason for Recommendations**

19. The report seeks determination of the application to vary Cardiff Council's Hackney Carriage table of fares. It is a legal requirement that the approved table of fares applies to all hackney carriage journeys that start and end within the Cardiff boundary.

### **Financial Implications**

20. This report does not directly result in any additional financial implications.
21. The financial advice for the earlier report to Cabinet on 23<sup>rd</sup> June set out that any decision reached with regard to variation of hackney carriage fees should be taken with regard to evidence of rising costs, fairness in the supplier market and consideration of the customer.

22. It should also be reiterated that the Council is a major customer of the taxi industry and any additional financial impact on related budgets in the short and medium term will need to be considered.

### **Legal Implications**

23. The proposed variation to the Table of Fares has been published and relevant representations have been received. Cabinet must now consider these representations and decide whether to ratify the original decision or vary the Table of Fares. If Cabinet approves a variation, it must set a new date for the variation to come into force, which must not be later than 31 October 2022.

24. In considering this report, regard should be had to:

- (a) Public sector duties under the Equalities Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, when making decisions, Councils must have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. Protected characteristics are a. Age; b. Gender reassignment; c. Sex; d. Race – including ethnic or national origin, colour or nationality; e. Disability; f. Pregnancy and maternity; g. Marriage and civil partnership; h. Sexual orientation; i. Religion or belief – including lack of belief; and

- (b) the Well Being of Future Generations (Wales) Act 2015. The Well-Being of Future Generations (Wales) Act 2015 ('the Act') is about improving the social, economic, environmental and cultural well-being of Wales. The Act places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language and is globally responsible. In discharging their respective duties under the Act, each public body listed in the Act must set and published wellbeing objectives. These objectives will show how each public body will work to achieve the vision for Wales set out in the national wellbeing goals. When exercising its functions, Cabinet should consider how the proposed decision will contribute towards meeting the wellbeing objectives set by the Council and in so doing achieve the national wellbeing goals. The wellbeing duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Cabinet must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, Cabinet must:

- look to the long term.
- focus on prevention by understanding the root causes of problems.

- deliver an integrated approach to achieving the 7 national well-being goals.
- work in collaboration with others to find shared sustainable solutions.
- involve people from all sections of the community in the decisions which affect them.

### **HR Implications**

25. There are no HR implications as a result of this report.

### **Property Implications**

26. There are no property implications as a result of this report

## **RECOMMENDATIONS**

Cabinet is recommended to:

1. Note the contents of this report and consider the representations received to the Public Notice in Appendix C and D.
2. Consider the comments from the Hackney Carriage Alliance/Unite (the original applicant to vary the Table of Fares) in Appendix E in response to Dragon Taxis' counter proposal.
3. Decide whether to ratify the original decision made on 23 June 2022 or adopt an alternative variation to the Table of Fares.
4. Set an implementation date of 8 October 2022 for the changes to the Table of Fares to take effect.

SENIOR RESPONSIBLE OFFICER	Neil Hanratty Director of Economic Development
	22 September 2022

*The following appendices are attached:*

- Appendix A: Cabinet Report of 23 June 2022 - Application for a Hackney Carriage fare Increase
- Appendix B: Public Notice of Table of Fares 11.07.22
- Appendix C: Dragon Taxis Cardiff - HCA Proposal Objection & Counter Proposal
- Appendix D: Copy of Letter of Support Received by 226 Drivers
- Appendix E: HCA Comments in Response to Dragon Objection

Mae'r dudalen hon yn wag yn fwriadol





**APPLICATION FOR A HACKNEY CARRIAGE FARE INCREASE**

**TRANSPORT & STRATEGIC PLANNING (COUNCILLOR DAN DE'ATH)**

**AGENDA ITEM: 3**

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**Reason for this Report**

1. To consider an application made by the Unite the Union/Cardiff Hackney Carriage Alliance to vary the current rate of hackney carriage fares in Cardiff.

**Background**

2. The Council may fix or vary the rate of fare for the hire of a hackney carriage under the provisions of Section 65 of the Local Government (Miscellaneous Provisions) Act, 1976. The Section requires that any variation of the fare must be advertised in a local paper and that a period of notice of at least 14 days be given to enable any person to make objections.
3. The current tariff of fares has been in place since March 2018 and is shown in Appendix A
4. An application has been made by Unite the Union/Cardiff Hackney Carriage Alliance (The Alliance), who are the formally recognised taxi trade organisation in Cardiff, to increase the tariff of fares that hackney carriages can charge for journeys that start and end within the city.

**Hackney Carriage Alliance's Request**

5. The Alliance's application introduces changes to the structure of the tariff, resulting in three tariffs in operation depending on the time and day. This fare structure results in higher fares during evenings, weekends, nights and bank holidays.

This structure results in increased fares during weekday evenings and weekends (Tariff 2), and further increased fares on weekday nights, weekend evenings and bank holidays (Tariff 3).

All tariffs start at £3.50 and the price increases in increments of 20p, the difference between the tariffs is the distance travelled for each 20p

increment (otherwise known as the click). For example, Tariff 1 increments are every 170 yards, Tariff 2 are every 150 yards, and Tariff 3 are every 130 yards. Full details of the request, including supporting information, are shown in Appendix B.

6. In support of the application the Alliance states:

*“This is an overhaul of how the meter system currently works in Hackney vehicles yet keeps the rates at a reasonable and affordable price to the public while assisting the future of the trade in Cardiff. Consideration was also given to the unsociable hours and working bank holidays in tariff 2&3 as all other workplaces compensate their workforce when working at such times.*

*The proposed raise would bring Cardiff from number 156 on the table of all UK Hackney rates to a modest 54th position and in line with other districts such as Glasgow, Adur and Nottingham to name a few which have had their rates last increased as far back as 2014 and are due to undergo the same exercise as Cardiff is currently undertaking.*

*While the initial figures look to be a leap of increase, these figures compared to the increase of the cost of living since 2017 (12.1%) and the increase in fuel for the same period (56%) you will recognise that great care has been taken in considering this proposal”.*

7. The proposal would increase the cost of an average 3-mile journey by 21.8% during the day, 32.1% during the evening and weekends, and 28.4% during the night and bank holidays. The waiting time will increase from 20p for each period of 48 seconds, to 30p for each period of 30 seconds. The charge for soiling the vehicle will also increase from £50 to £60.
8. The following tables provide details of the current maximum fares for journeys within Cardiff with a comparison to the proposed tariffs.

**Monday to Friday 05:00 – 20:00**

<b>Journey Length</b>	<b>Current Tariff</b>	<b>Alliance Proposal</b>	<b>Percentage increase</b>
1 mile	£4.20	£5.30	26.2%
2 mile	£6.00	£7.50	25%
3 mile	£7.80	£9.50	21.8%
4 mile	£9.60	£11.50	19.8%
5 mile	£11.40	£13.70	20.2%
10 mile	£20.40	£24.10	18.1%

**Monday to Friday 20:00 – 22:00**  
**Saturday & Sunday 05:00 – 22:00**

<b>Journey Length</b>	<b>Current Tariff</b>	<b>Alliance Proposal tariff 2</b>	<b>Percentage increase</b>
1 mile	£4.20	£5.50	30.1%
2 mile	£6.00	£7.90	31.2%
3 mile	£7.80	£10.30	32.1%
4 mile	£9.60	£12.70	32.3%
5 mile	£11.40	£14.90	30.1%
10 mile	£20.40	£26.70	30.1%

**Any Day 22:00 – 05:00 and all-day Bank Holidays**

<b>Journey Length</b>	<b>Current Tariff After midnight</b>	<b>Alliance Proposal tariff 3</b>	<b>Percentage increase</b>
1 mile	£5.20	£5.90	13.5%
2 mile	£7.00	£8.70	24.3%
3 mile	£8.80	£11.30	28.4%
4 mile	£10.60	£14.10	33%
5 mile	£12.40	£16.70	34.7%
10 mile	£21.40	£30.30	41.6%

**Considerations**

- The average annual rate of inflation (CPI) between March 2018 and February 2022 was 2%, therefore, the proposed increase is above the rate of inflation since the previous fare increase. However, the rate of inflation in February 2022 is 5.5% and this is forecast to rise throughout 2022.

(Please also note that CPI may not be truly representative of the additional costs associated with the taxi trade, which include the cost of fuel and used cars. The cost of used cars has increased significantly since the start of the Covid 19 pandemic and fuel costs have also risen significantly above inflation and are forecast to rise further in 2022).

10. The [AA Fuel Price Report](#) shows that the cost of diesel has increased from a Wales average of 122.2p per litre in March 2018 to 151.0p per litre in February 2022 (23.6% increase). Unleaded 95 Octane petrol has also increased during the same period from 119.3p per litre to 147.2p per litre (23.4% increase).
11. It should be noted that since February 2022 (the latest AA fuel report available at time of writing) the cost of fuel has risen significantly. On 30<sup>th</sup> May 2022, the cost of fuel at Tesco, Western Avenue is 178.9p per litre for diesel and £163.9p per litre for petrol. This is an increase of 46.4% for diesel and 37.4% for petrol, compared to the Wales average price in March 2018.
12. Hackney Carriage Vehicle Licence fees have increased by 3.9% since March 2018 from £154 to £160 for a 12-month renewal.
13. Consideration should be given to obtaining a balance between increasing the fare to compensate in the increase of costs of running a hackney carriage and ensuring that the increase does not deter the public from using hackney carriages.
14. For information the following table provides details of the daytime rate of the 2-mile fare currently authorised by the Council alongside the proposed fare and fares authorised by a sample of licensing authorities in March 2022:

<b>Authority</b>	<b>Cost per 2-mile journey</b>
London	£8.60
Watford	£8.40
Reading	£8.00
Oxford	£7.60
<b>Alliance Proposed Tariff</b>	<b>£7.50</b>
Cheltenham	£7.40
Brighton	£7.40
Bath and North East Somerset	£7.20
Wiltshire	£7.00
Carmarthenshire	£6.80
Somerset West & Taunton	£6.80
Plymouth	£6.60
Bristol	£6.40
Leeds	£6.40
Birmingham	£6.20
<b>Cardiff (Current Tariff)</b>	<b>£6.00</b>
Conwy	£6.00
Vale of Glamorgan	£6.00
Manchester	£5.90
Bridgend	£5.80
Swansea	£5.70
Newport	£5.60
Powys	£5.40
Blaenau Gwent	£5.20
Rhondda Cynon Taf	£5.20

15. Cardiff is 161<sup>st</sup> in the 2-mile fare league table out of 358 local authorities, as printed in the [March 2022 edition of Private Hire & Taxi Monthly](#). The proposed increase would move Cardiff to 10<sup>th</sup> out of 358 local authorities.
16. However, there are several fare increases being implemented by Local Authorities since the March report. Therefore, Cardiff would be 23<sup>rd</sup> out of 358 local authorities as of 30<sup>th</sup> May 2022. Comparable authorities on 30<sup>th</sup> May 2022 are:

<b>Authority</b>	<b>Cost per 2-mile journey</b>
London	£9.80
Watford	£8.40
Reading	£8.00
Brighton	£7.80
Oxford	£7.60
Southampton	£7.60
<b>Alliance Proposed Tariff</b>	<b>£7.50</b>
Cheltenham	£7.40
Bath and North East Somerset	£7.20
Wiltshire	£7.00
Carmarthenshire	£6.80
Somerset West & Taunton	£6.80
Plymouth	£6.60
Bristol	£6.40
Leeds	£6.40
Birmingham	£6.20
<b>Cardiff (Current Tariff)</b>	<b>£6.00</b>
Conwy	£6.00
Vale of Glamorgan	£6.00
Manchester	£5.90
Bridgend	£5.80
Swansea	£5.70
Newport	£5.60
Powys	£5.40
Blaenau Gwent	£5.20
Rhondda Cynon Taf	£5.20

17. The highest fare increase in March, April and May was implemented by Southampton moving the 2-mile fare by £3.20 from £6.20 to £9.40.
18. Should Cabinet agree to vary the tariff, the variation would need to be advertised for a period of at least 14 days to permit persons to make an objection. Should there be no objections; the variation would then come into effect on the date of the expiry of the period of notice. However, should an objection be received the objection would need to be considered by Cabinet before the variation is implemented.

## **Reason for Recommendations**

14. The report seeks determination of the application to vary Cardiff Council's Hackney Carriage tariff of fares. It is a legal requirement that the approved tariff applies to all hackney carriage journeys that start and end within the Cardiff boundary.

## **Financial Implications**

15. The decision maker needs to be content with the rationale for the fee increase which will include evidence of rising costs and fairness in the supplier market and consideration of the customer.
16. It should also be noted that the Council is a major customer of the taxi industry in areas such as Additional Learning Needs Schools Transport and consideration will need to be given to the solutions required to resolve any additional financial impact on related budgets in the short and medium term.
17. The increase in fares will need to be publicly advertised and the associated costs of advertising will be borne by the Licensing Service from within its existing budget

## **Legal Implications**

18. If Cabinet decides to amend the fare tariff it will be necessary to give public notice in accordance with Section 65 of the Local Government (Miscellaneous Provisions) Act 1976. The Cabinet will then have to consider any objections that are received.
19. All decisions taken by or on behalf of the Council must (a) be within the legal powers of the Council; (b) comply with any procedural requirement imposed by law; (c) be within the powers of the body or person exercising powers on behalf of the Council; (d) be undertaken in accordance with the procedural requirements imposed by the Council e.g. standing orders and financial regulations; (e) be fully and properly informed; (f) be properly motivated; (g) be taken having regard to the Council's fiduciary duty to its taxpayers; and (h) be reasonable and proper in all the circumstances.

## **HR Implications**

20. There are no HR implications as a result of this report.

## **Property Implications**

21. There are no property implications as a result of this report

## RECOMMENDATIONS

Cabinet is recommended to:

1. Note the issues and impacts to taxi fares set out in the report
2. Approve the application put forward by the Cardiff Hackney Alliance/Unite with an implementation date of 1 September 2022 (provided that there are no objections).
3. Authorise the advertisement of the variation in a local newspaper.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Neil Hanratty</b> <b>Director of Economic Development</b>
	17 June 2022

*The following appendices are attached:*

Appendix A: Current Hackney Carriage Tariff

Appendix B: The Alliance's application to increase hackney carriage fares

Appendix C: [Private Hire & Taxi Monthly Fare League Table](#)

Mae'r dudalen hon yn wag yn fwriadol



## CYNGOR CAERDYDD - PRISOEDD AR GYFER CERBYDAU HACNI (TACSIS)

Sylwrodd eich 1 Medi 2022 ymlaen, mae Cyngor Caerdydd yn cynnig amrywio'r Tabl Prisoedd sydd mewn grym ar hyn o bryd ar gyfer cerbydau hani yn Ninas a Sir Caerdydd, yn unol â'i bwerau dan Adran 65 Deddf Llywodraeth Leol (Darpariaethau Amrywiol) 1976 yn y modd canlynol:

Pris ar hyn o bryd		Pris a gynnigr
<ul style="list-style-type: none"> <li>Y 103 llathen (94.18 metr) gyntaf neu ran o hynny</li> </ul>	£2.50	<b>Tariff 1</b> Ar gyfer unrhyw logi dydd Llun i ddydd Gwener rhwng 05:00 a 20:00, ac eithrio ar wyliau cyhoeddus: <ul style="list-style-type: none"> <li>Am y 250 llathen gyntaf mae isafswm tâl o £3.50 (yn daladwy ymlaen llaw)</li> <li>Ar gyfer pob <b>170</b> llathen ychwanegol codir tâl o 20c (yn daladwy ymlaen llaw)</li> <li>Bydd tâl o 30c am bob <b>40</b> eiliad o amser aros (gan gynnwys o dan 8mya)</li> </ul>
<ul style="list-style-type: none"> <li>Os yw'r pellter yn fwy na 103 llathen, y 103 llathen gyntaf</li> </ul>	£2.50	<b>Tariff 2</b> Ar gyfer unrhyw logi naill ai dydd Llun i ddydd Gwener rhwng 20:00 a 22:00, neu ddydd Sadwrn neu ddydd Sul rhwng 05:00 a 22:00, ac eithrio ar wyliau cyhoeddus: <ul style="list-style-type: none"> <li>Am y 250 llathen gyntaf mae isafswm tâl o £3.50 (yn daladwy ymlaen llaw)</li> <li>Ar gyfer pob <b>150</b> llathen ychwanegol codir tâl o 20c (yn daladwy ymlaen llaw)</li> <li>Bydd tâl o 30c am bob <b>35</b> eiliad o amser aros (gan gynnwys o dan 8mya)</li> </ul>
<ul style="list-style-type: none"> <li>Am bob 195 llathen wedyn</li> </ul>	20c	
<b>Amser Aros</b> Am bob cyfnod 48 eiliad	20c	<b>Tariff 3</b> Ar gyfer unrhyw logi rhwng 22:00 ar unrhyw ddiwrnod a 05:00 y diwrnod canlynol neu ar unrhyw adeg ar wyliau cyhoeddus: <ul style="list-style-type: none"> <li>Am y 250 llathen gyntaf mae isafswm tâl o £3.50 (yn daladwy ymlaen llaw)</li> <li>Ar gyfer pob <b>130</b> llathen ychwanegol codir tâl o 20c (yn daladwy ymlaen llaw)</li> <li>Bydd tâl o 30c am bob <b>30</b> eiliad o amser aros (gan gynnwys o dan 8mya)</li> </ul>
<b>Ffioedd Ychwanegol</b> <ul style="list-style-type: none"> <li>Ar gyfer logi rhwng canol nos a 6.00am, ac ar ddydd Sul a Gwyliau Banc</li> <li>Ar gyfer logi rhwng 8.00pm Noswyl Nadolig a 6.00am ar 27 Rhagfyr a rhwng 8.00pm a Noswyl Nadolig a 6.00am 2 Ionawr</li> <li>Ar gyfer pob teithiwr dros gyfanswm o bedwar</li> <li>Beiciau, megiau mawr (o leiaf 36" x 24" x 18") ac eitemau dodrefnol fesul eitem)</li> <li>Am farwedd cerbyd</li> </ul>	£1.00	
Ni fydd costau ychwanegol am deithiau gyda'r nos, ar ddydd Sul a gwyliau banc yn berthnasol pan godir costau ychwanegol am y Nadolig a'r flwyddyn newydd	£3.00	
	£1.00	<b>Ffioedd Ychwanegol</b> <ul style="list-style-type: none"> <li>Pob tariff yn seiliedig ar 1 – 4 teithiwr. Mae tâl ychwanegol o <b>£1 y teithiwr</b> os oes mwy na 4 teithiwr yn teithio.</li> <li>Ychwanegol <b>£3</b> at deithiau sy'n digwydd ar Noswyl Nadolig, Dydd Nadolig, Gŵyl San Steffan, Nos Galan neu Ddydd Calan.</li> <li>Gall y gyrrwr godi tâl o hyd at <b>£60</b> ar deithiwr am faeddu'r cerbyd.</li> </ul>
	50c	
	£50	

Rhaid gwneud unrhyw wrthwynebiad i'r amrywriad a gynnigr yn ysgrifenedig i'r Rheolwr Tim, Trwyddedu, Neuadd y Ddinas, Caerdydd, CF10 3ND. Rhaid derbyn pob gwrthwynebiad erbyn 12:00pm ar **25 Gorffennaf 2022**. Bydd copi o'r Hysbysiad hwn yn Swyddfa Cludo'r Cyhoedd, Neuadd y Ddinas, Caerdydd, CF10 3ND o heddiw tan 12.00pm ar 25 Gorffennaf 2022 a gall y cyhoedd ei archwilio am ddim ar unrhyw adeg resymol yn ddi-dâl.

Dyddiedig 11 Gorffennaf 2022  
 Trwyddedu, Cyngor Caerdydd, Neuadd y Ddinas, Caerdydd, CF10 3ND  
 trwyddedu@caerdydd.gov.uk

## CARDIFF COUNCIL - FARES FOR HACKNEY CARRIAGES (TAXIS)

Take notice that from 1 September 2022 Cardiff Council proposes to vary the Table of Fares currently in force for hackney carriages in the City and County of Cardiff, pursuant to its powers under Section 65 of the Local Government (Miscellaneous Provisions) Act 1976 in the following manner: -

Appendix B

Present Charge		Proposed Charge
<ul style="list-style-type: none"> <li>First 103 yards (94.18 metres) or Part thereof</li> </ul>	£2.50	<b>Tariff 1</b> For any hiring during Monday to Friday between 05:00 and 20:00, other than on a public holiday: <ul style="list-style-type: none"> <li>For the first 250 yards there is a minimum charge of £3.50 (payable in advance)</li> <li>For each additional <b>170</b> yards there is a charge of 20p (payable in advance)</li> <li>Every <b>40</b> seconds waiting time (including below 8mph) charged at 30p</li> </ul>
<ul style="list-style-type: none"> <li>If distance exceeds 103 yards, for first 103 yards</li> </ul>	£2.50	<b>Tariff 2</b> For any hiring either during Monday to Friday between 20:00 and 22:00 or during Saturday or Sunday between 05:00 and 22:00, other than on a public holiday: <ul style="list-style-type: none"> <li>For the first 250 yards there is a minimum charge of £3.50 (payable in advance)</li> <li>For each additional <b>150</b> yards there is a charge of 20p (payable in advance)</li> <li>Every <b>35</b> seconds waiting time (including below 8mph) charged at 30p</li> </ul>
<ul style="list-style-type: none"> <li>For each subsequent 195 yards</li> </ul>	20p	
<b>Waiting Time</b> For each period of 48 seconds	20p	<b>Tariff 3</b> For any hiring between 22:00 on any day and 05:00 the following day or at any time on a public holiday: <ul style="list-style-type: none"> <li>For the first 250 yards there is a minimum charge of £3.50 (payable in advance)</li> <li>For each additional <b>130</b> yards there is a charge of 20p (payable in advance)</li> <li>Every <b>30</b> seconds waiting time (including below 8mph) charged at 30p</li> </ul>
<b>Extra Charges</b> <ul style="list-style-type: none"> <li>For hirings between midnight and 6.00am, and on Sundays and Bank Holidays</li> <li>For hirings between 8.00pm Christmas Eve and 6.00am on 27 December and between 8.00pm New Year's Eve and 6.00am 2nd January.</li> <li>For each passenger exceeding four</li> <li>Bicycles, cabin trunks (minimum size 36" x 24" x 18") and items of furniture (charged per item)</li> <li>For the fouling of a vehicle</li> </ul>	£1.00	
The extra charge for night-time, Sundays and bank holidays does not apply when the extra charge for Christmas and the New Year applies.	£3.00	
	£1.00	<b>Extra Charges</b> <ul style="list-style-type: none"> <li>All tariffs based on 1 – 4 passengers. An additional charge of <b>£1 per passenger</b> if more than 4 passengers travelling.</li> <li>An additional <b>£3</b> added to journeys that take place on Christmas Eve, Christmas Day, Boxing Day, New Year's Eve or New Year's Day.</li> <li>The driver may charge the passenger up to <b>£60</b> for soiling the vehicle.</li> </ul>
	50p	
	£50	

Any objection to the proposed variation must be made in writing to the Team Manager, Licensing, City Hall, Cardiff, CF10 3ND. All objections must be received by 12:00pm on **25 July 2022**. A copy of this notice shall be deposited at the Public Carriage Office, City Hall, Cardiff, CF10 3ND from today until 12.00pm on 25 July 2022 and shall be open to public inspection at all reasonable hours without payment.

Dated 11 July 2022  
 Licensing, Cardiff Council, City Hall, Cardiff, CF10 3ND  
 licensing@cardiff.gov.uk

Mae'r dudalen hon yn wag yn fwriadol

# **Dragon Taxis Cardiff**

Hackney Carriage Alliance Proposal Objection

&

Counter Proposal

# Table of Contents

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## Company Background

Dragon Taxis Cardiff represent over 800 Cardiff Council Licensed Drivers. A larger representation than any other local company or association by far. Since 1995 Dragon Taxis Cardiff have submitted and had approved the majority of Hackney Carriage Tariff proposals. As a company we have always taken a very pragmatic view to any increase. A balance between what is fair for Drivers and what is manageable for passengers has been the cornerstone of our applications.

## Introduction

Dragon Taxis Cardiff is fully supportive of a Cardiff Hackney Carriage Tariff increase because drivers have felt the very significant impact from the pandemic, fuel increases and general cost of living increases.

However, we do also take the long-term view that the tariff increase must be considered carefully not to unfairly 'punish' passengers to the extent that passenger demand is significantly impacted. We should remember that using a taxi is an essential form of transport for many people that cannot access public transport and that do not have access to a private vehicle. We have seen a recent dip in overall passenger demand which we believe can be attributed to the current cost of living crisis and we do not wish to exasperate that situation.

On closer analysis of the Cardiff Hackney Alliance's proposal, we think that the HCA tariffs are in excess of what they need to be and if implemented they will significantly reduce demand, therefore negatively impacting passengers and Drivers alike. The full impact of **the waiting time element** of the proposal has been overlooked and has the potential to significantly increase overall fares. The focus appears to have been on the distance charges. This is misleading and we hope that the following analysis will highlight the full ramifications.

In short, we object to the Hackney Carriage Alliance's Proposal specifically but believe a tariff increase is required as soon as possible. We furthermore **request an emergency meeting is held to approve our increase, so that the original staging date in September can be maintained.**

### Hackney Carriage Alliances Proposal vs Current Tariff (Tariff 1)

From Dragon Taxis extensive data and analysis, the average fare can be identified at 4 miles distance with 15 minutes waiting time throughout the course of the journey.

It is extremely important to note that waiting time is currently applicable whenever the vehicle travels below 5 mph. HCA would have this raised to 8mph in their proposal. This would impact on waiting time more than the average booking highlighted above. Please note the below represents exact calculations, these would actually round in £0.20.

**Tariff 1 Comparison**

	HCA Proposal	Current Tariff	Variance	Variance %
<b>Base Fare</b>	£3.50	£2.50	£1.00	<b>40.00%</b>
<b>First Mile</b>	£1.78	£1.70	£0.08	<b>4.53%</b>
<b>Subsequent Miles</b>	£2.07	£1.81	£0.27	<b>14.71%</b>
<b>Waiting Time per Min</b>	£0.45	£0.25	£0.20	<b>80.00%</b>

**Average 4 Mile Booking inc. 15 minutes waiting time**

	HCA Proposal	Current Tariff	Variance	Variance %
<b>Distance Charge</b>	£11.49	£9.61	£1.87	<b>19.48%</b>
<b>Waiting Time Charge</b>	£6.75	£3.75	£3.00	<b>80.00%</b>
<b>Total Charge</b>	<b>£18.24</b>	<b>£13.36</b>	<b>£4.87</b>	<b>36.37%</b>

As you can see, the average fare would **increase by 36.37% in total** if the waiting time element is factored in. This is extortionate and would see the booking levels reduce, impact passengers' ability to pay and reduce levels of Driver weekly earnings. If the same analysis carries forward to the Tariff 2 and 3 proposals the increase is even more pronounced.

We would therefore suggest a significant increase for the HCA but more balanced than that currently proposed. Please find below the counter proposal from Dragon Taxis Cardiff which we believe to be more market sensitive, which addresses Drivers concerns and protects the broader marketplace. We also think passengers will be more understanding of these increases given current market conditions.

## Counter Proposal

Tariff 1	Applicable Time Period
Base Fare - £2.50 (103 yards)	Monday to Friday – 06:00 to 07:00
103 yards to 1 Mile (1760 yards) - £0.29 (every 195 yards)	Monday to Thursday – 09:30 to 14:30
Subsequent Miles - £0.21 (every 195 yards)	Friday – 09:30 to 12:00
Waiting Time (<5 mph) - £0.20 (40 second intervals)	Monday to Thursday – 18:00 to 22:00

Tariff 2	Applicable Time Period
Base Fare - £3.50 (103 yards)	Sunday to Friday – 22:00 to 06:00
103 yards to 1 Mile (1760 yards) - £0.29 (every 195 yards)	Monday to Friday – 07:00 to 09:30
Subsequent Miles - £0.21 (every 195 yards)	Monday to Thursday – 14:30 to 18:00
Waiting Time (<5 mph) - £0.20 (40 second intervals)	Friday – 12:00 to 22:00
	Saturday & Sunday – 06:00 to 22:00

Tariff 3	Applicable Time Period
Base Fare - £4.50 (103 yards)	Friday & Saturday – 22:00 to 06:00
103 yards to 1 Mile (1760 yards) - £0.29 (every 195 yards)	
Subsequent Miles - £0.21 (every 195 yards)	
Waiting Time (<5 mph) - £0.20 (40 second intervals)	

Extras
Soiling Charge - £60.00
Xmas & NY - Tariff 3 + £3.00 extra

### Dragon Taxis Cardiff Proposal vs Current Tariff (Tariff 1)

From Dragon Taxis extensive data and analysis, the average fare can be identified at 4 miles distance with 15 minutes waiting time throughout the course of the journey.

The waiting time is currently applicable whenever the vehicle travels below 5 mph. Please note the below represents exact calculations, these would actually round in £0.10.

#### Tariff 1 Comparison

	Dragon Proposal	Current Tariff	Variance	Variance %
<b>Base Fare</b>	£2.50	£2.50	£0.00	<b>0.00%</b>
<b>First Mile</b>	£2.46	£1.70	£0.76	<b>44.75%</b>
<b>Subsequent Miles</b>	£1.90	£1.81	£0.09	<b>5.26%</b>
<b>Waiting Time per Min</b>	£0.30	£0.25	£0.05	<b>20.00%</b>

#### Average 4 Mile Booking inc. 15 minutes waiting time

	Dragon Proposal	Current Tariff	Variance	Variance %
<b>Distance Charge</b>	£10.66	£9.61	£1.05	<b>10.87%</b>
<b>Waiting Time Charge</b>	£4.50	£3.75	£0.75	<b>20.00%</b>
<b>Total Charge</b>	<b>£15.16</b>	<b>£13.36</b>	<b>£1.80</b>	<b>13.43%</b>



### Dragon Taxis Cardiff Proposal vs Hackney Carriage Alliance Proposal (Tariff 1)

From Dragon Taxis extensive data and analysis, the average fare can be identified at 4 miles distance with 15 minutes waiting time throughout the course of the journey.

The waiting time is currently applicable whenever the vehicle travels below 5 mph. Please note the below represents exact calculations, these would actually round in £0.10 for Dragon Taxis Cardiff's proposal and £0.20 for HCA's proposal.

#### Tariff 1 Comparison

	HCA Proposal	Dragon Proposal	Variance	Variance %
<b>Base Fare</b>	£3.50	£2.50	£1.00	<b>40.00%</b>
<b>First Mile</b>	£1.78	£2.46	(£0.68)	<b>(27.79%)</b>
<b>Subsequent Miles</b>	£2.07	£1.90	£0.17	<b>8.98%</b>
<b>Waiting Time per Min</b>	£0.45	£0.30	£0.15	<b>50.00%</b>

#### Average 4 Mile Booking inc. 15 minutes waiting time

	HCA Proposal	Dragon Proposal	Variance	Variance %
<b>Distance Charge</b>	£11.49	£10.66	£0.83	<b>7.77%</b>
<b>Waiting Time Charge</b>	£6.75	£4.50	£2.25	<b>50.00%</b>
<b>Total Charge</b>	<b>£18.24</b>	<b>£15.16</b>	<b>£3.08</b>	<b>20.30%</b>

The above clearly outlines the significant difference between the Dragon Taxis Cardiff and the Hackney Carriage Alliance's proposals. It shows that the HCA proposal is on average 20.30% more expensive than the Dragon Taxis Cardiff proposal.

This additional amount may be seen as positive by Drivers in the short term. However, the long-term effects of such an increase would see a negative impact for Drivers. Taxi usage will dramatically reduce in favour of alternative transportation options, but in reality it may simply prevent passengers from taking essential journeys.

## **Conclusion**

The council's own report states that the cumulative inflationary increase since the last tariff change in December 2017 is 12.10%. With that in mind we cannot justify the Hackney Carriage Alliances extortionate 36.37% increase to the average booking of 4 miles with 15 minutes waiting time. This will not benefit Drivers. It will reduce their bookings and in turn their ability to earn a living.

The counter proposal that Dragon Taxis Cardiff recommends is a 13.43% increase for the average booking and is both fair to the Drivers while also not being detrimental to their opportunity to earn. It is also very important to note that the Dragon Taxis proposal is also fair for Tariff 2 & 3 not becoming significantly more, whereas the HCA Proposal becomes even more extortionate.

We would request the committee to fully understand the broader implications of the HCA Proposal and understand all the subtle and seemingly unimportant tariff adjustments being proposed, which will have significant repercussions.

Thank you for your time and consideration.

## Appendix D

**Name**

**Address**

**Badge Number PH/Hackney**

I am a member of the public and a taxi driver who would like to support the hackney increase proposal as the trade is in a critical situation at present due to Inflationary pressures that have hit the trade harder than other industries which has resulted in many drivers leaving the trade, with the cost of living and as you're probably aware price of fuel For example, diesel has risen by 61% since the last time the hackney carriage fares were increased (£1.22 per litre in March 2018 to £1.97 in July 2022) and the average price of used cars rose to 32% in the months between April 2021 and April 2022.

Many Hackney drivers have their plates on hold because they cannot make enough money to live on after expenses, because of the increase in running costs. If this increase is not implemented, our trade is on a downward spiral and there will be fewer and fewer Hackneys taxis available public. For these reasons, I am fully in supporting of the proposed meter increase in this open public consultation

**Kind Regards**

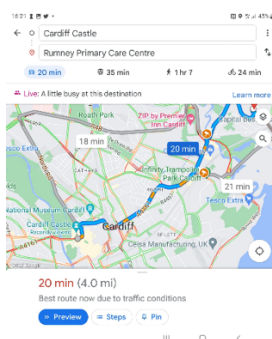
**Mae'r dudalen hon yn wag yn fwriadol**



We ask that the committee to consider how many objections have been raised in regard to the proposal previously agreed, and be mindful of who have objected.

While a licensed operator is within its rights to either propose or indeed object to a meter increase for the Hackney trade in Cardiff, we believe that the information that they have given to be untrue for the following reasons.

A 4-mile journey from Cardiff Castle to Rumney Primary Care Centre at 16:20 on a midweek day would take approximately 20 minutes and just 14 minutes on a Sunday at 21:00 according to Google Maps which uses real time traffic analysis that shows no less than SEVEN slow moving points and ONE severe moving point along the route during rush hour traffic conditions.



Without these EIGHT points of delay and travelling at an average speed within a city of 16mph then this length of distance would take 15 minutes to complete.

Dragon have stated that their 'extensive data and analysis' shows that 4 mile is an average journey length and a surprising 'FIFTEEN minutes of waiting time throughout the course of the journey'.

While we appreciate that the iCabbi system is worthy of its task, we question how their average 4 mile journey can take 15 minutes of waiting time and just 5 minutes to actually drive the distance, unless of course the data that they have drawn from the system to analyse is from either the booking time, the driver allocated time or the driver arrival time to completion and not in fact the time a driver had a customer in the vehicle.

On a Sunday evening with no traffic issues this journey takes just 14 minutes at 17mph.

My nine years' experience with iCabbi lends me to believe that the start point was from when a driver was issued the booking and not when a passenger is in a vehicle, heaven forbid a driver would complete 4 mile in just 5 minutes on an average... that's 48mph!

Perhaps Dragon should quantify their data on this matter before it is taken into consideration.

Another point to consider is that a Hackney working on a Private Hire company must engage the council meter and that of the operator for every journey, something that Dragon do not encourage their Hackney drivers to do when working on their platform because they take a percentage of each fare as commission for supplying the work and should the booking be payable by debit card direct to Dragon then they could not charge the customer if the Cardiff Hackney meter was engaged on the journey.

The above-mentioned journey of 4 mile has been put into the App's used by the three major operators in Cardiff and have given the following quotations.

Uber quoted £13.68

Bolt quoted £12.70

Dragon quoted £10.60-11.70

The proposed Hackney rate would be £11.50 with no waiting time and £13.75 with 5 minutes of standing traffic as per the Google Maps above and time taken to travel at 16mph without traffic.

The objection by Dragon touches on the cost of Tariff 2 & 3 yet fails to mention that Dragon, Uber and Bolt all charge an increased rate during peak times.

This shows that the proposal put forward by the Hackney trade is reasonable and not that distant from what the operators charge within Cardiff.

However, most Hackney journeys from the ranks within the City Centre are around 2.5 mile and not comparable to a Private Hire company which covers a much larger area than the Hackney trade concentrates on and has school runs, hospital contracts and airports that would increase its average journey length to 4 mile as they have used for their argument.

The waiting time for the Hackney rates revues has never been taken into consideration, including the proposals made by Dragon in previous years and is not included in the table of rates that are published in the Private Hire and Taxi Monthly magazine and should not be considered for this discussion.

However, the 20p per 48 seconds has been static for many years and has never considered the drivers time when at work just like an employed person is not paid for when they are active at work but for the total time while 'clocked in' such as that person is paid while walking between offices and not just when they are in that office undertaking a meeting.

Therefore, a small increase has been added to the waiting time and is a justified increase and has already been agreed by this committee before going to publication notice.

Hackney drivers are sole traders unlike licensed operators whose business relies on commission charged to the drivers who undertake bookings on their behalf. It is in the operator's interest to keep fares artificially low to encourage more bookings, but it is the drivers who suffer for these lower rates with their own fixed costs of running a vehicle.

We ask that you are mindful that no member of the public and no Hackney driver have raised a concern regarding the proposed increase and therefore ask that the increase is to proceed as advertised.

Yours sincerely

Sanwar Ali Ahmed, Branch Secretary  
CHA/Unite Wales Cab Section

*Sanwar Ahmed*